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ABSTRACT

This document contains testimony presented on H.R. 13991, a bill to provide for obtaining certain educational statistics. The bill states that on or before July 1, 1975, the Secretary of Health, Education, and Welfare shall report to the Congress on the feasibility of: (1) collecting, organizing, and reporting full and complete statistical information on the condition of education in the United States; (2) conducting and publishing the results of specialized analyses of the significance of such statistical information; (3) assisting State and local educational agencies in improving data collection activities; (4) developing, in cooperation with State education agencies, a comprehensive plan for the collection, analysis, and dissemination of data to make educational policy determinations and to operate educational programs; (5) coordinating the statistical information gathered with other federal agencies that need educational statistics; (6) providing direct access to the statistical information collected; and (7) investigating and reporting educational policies and activities in foreign countries. The appendix contains numerous letters and other written testimony presented to the committee. (Author/DN)

ED 100017

TO OBTAIN CERTAIN EDUCATIONAL STATISTICS

HEARING

BEFORE THE

GENERAL SUBCOMMITTEE ON EDUCATION

OF THE

COMMITTEE ON EDUCATION AND LABOR
HOUSE OF REPRESENTATIVES

NINETY-THIRD CONGRESS

SECOND SESSION

ON

H.R. 13991

A BILL TO PROVIDE FOR OBTAINING CERTAIN EDUCATIONAL STATISTICS

HEARING HELD IN WASHINGTON, D.C., MAY 7, 1974

Printed for the use of the Committee on Education and Labor

CARL D. PERKINS, *Chairman*

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TO OBTAIN CERTAIN EDUCATIONAL STATISTICS

TUESDAY, MAY 7, 1974

House of Representatives,
General Subcommittee on Education,
Committee on Education and Labor,
Washington, D.C.

The subcommittee met at 10 a.m., pursuant to notice, in room 2175, Rayburn House Office Building, Hon. Carl D. Perkins (chairman of the subcommittee) presiding.

Present: Representatives Perkins, Bell, Quie, and Steiger.

Staff members present: Jack Jennings, counsel; and Christopher Cross, minority legislative associate.

[Text of H.R. 13991 follows:]

[H.R. 13991, 93d Cong.: 2d sess.]

A BILL To provide for obtaining certain educational statistics

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That on or before July 1, 1975, the Secretary of Health, Education, and Welfare shall report to the Congress on the feasibility of performing the following operations with respect to the collection of educational statistics:

(1) collecting, organizing, and reporting full and complete statistical information on the condition of education in the United States.

(2) conducting and publishing the results of specialized analyses of the significance of such statistical information.

(3) assisting State and local educational agencies in improving and automating their statistical and data collection activities.

(4) developing, in cooperation with State educational agencies, a comprehensive plan for the collection, analysis, and dissemination of data necessary to make educational policy determinations and to operate educational programs.

(5) coordinating the statistical information gathered with other Federal agencies which need educational statistics.

(6) providing direct access to the statistical information collected to any interested public or private agencies, organizations, or individuals, and

(7) investigating and reporting of educational policies and activities in foreign countries.

Such report shall include recommendations with respect to the most effective method for administration of such a program of collection, analysis, and dissemination of educational statistics.

Chairman Perkins. The General Subcommittee on Education is holding a hearing today on H.R. 13991, a bill to require the Secretary of Health, Education, and Welfare to report to the Congress by July 1, 1975, on the best means to improve the collection and dissemination of educational statistics. I have introduced this bill with the cosponsorship of the ranking Republican member of our committee, Congressman Al Quie.

The collection and dissemination of educational statistics today is in a sorry state. The Federal Government, which should have conscientiously over the years performed the task of collecting and disseminating accurate and current data on education, has simply not fulfilled this responsibility.

The President's Commission on School Finance stated in its final report in 1972:

> Data collection, analysis, and dissemination activities are woefully inadequate to meet current needs. The information we do have is sketchy, often inconsistent, generally out-of-date, and as a consequence, of limited use.

The Commission's report goes on to say:

> Even in routine areas such as enrollments, expenditures, revenue sources, graduations, and drop-outs, we either do not have data at all, or what we do have is severely limited in value because of being too old.

I fully concur in these statements, and I believe that we must greatly increase Federal support for the collection and dissemination of educational statistics. In 1972 only $6.1 million was spent for education statistics, while more than $51 million was spent for labor statistics, $35 million for health statistics, $52.9 million for production and distribution statistics, and $12 million for crime statistics.

Not only should funding be increased on the Federal level, but a way must also be found to improve the administrative structure to perform the job. Clearly, the present apparatus is not adequate.

The tremendous lack of adequate statistical data on the Federal level was forcefully brought home to the committee last year when we were considering an extension of the Elementary and Secondary Education Act and of related acts. Time after time, when we sought data from Federal agencies to arrive at sound policy decisions, we were told that it either was not available, or that it was in such a form as to be almost useless.

I am very interested in hearing today the administration's views on the state of educational statistics and its proposals for improving this situation. The subcommittee is also sending letters this week to numerous individuals and organizations, asking their views on the bill. We will incorporate these responses in today's hearing record. (See appendix II.)

I am delighted to welcome you here, Dr. Ottina. You may proceed in anyway you prefer.

STATEMENT OF JOHN OTTINA, U.S. COMMISSIONER OF EDUCATION; ACCOMPANIED BY CHARLES M. COOKE, JR., DEPUTY ASSISTANT SECRETARY FOR LEGISLATION (EDUCATION), AND DOROTHY GILFORD, ASSISTANT COMMISSIONER FOR EDUCATION STATISTICS, DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Mr. OTTINA. I would like to introduce Mrs. Dorothy Gilford, on my right, who is Assistant Commissioner for Education Statistics, and on my left, Mr. Charles Cooke, Jr., who is Deputy Assistant Secretary for Legislation (Education, Department of Health, Education, and Welfare).

Mr. Chairman and members of the subcommittee, I am pleased to appear before you today to discuss H.R. 13991 and, more generally, methods for improving our system of collecting, analyzing, and disseminating educational statistics.

I recognize that H.R. 13991 and the Senate provisions in S. 1539 are based upon the desire of the House and Senate committees for more timely and extensive educational statistics than are currently available. Your major concerns in this area, as expressed in committee reports and floor statements, are important and often justified. Your efforts to make sound legislative decisions are sometimes hampered by a lack of complete and reliable data or by information which, as you have pointed out, is too old. I fully understand your concerns, Mr. Chairman, because I face these same problems in my efforts to make sound administrative decisions.

The Office of Education has been attempting to improve the quality of educational data for some time. In this connection, I would like to review briefly the history of the National Center for Educational Statistics and discuss activities during the past few years to improve educational statistics. These include participative planning, measures to improve timeliness, and initiation of new products and service.

Beginning in the late sixties the information requirements of the new program activities authorized by the Congress, including the needs to meet the congressional mandates for program evaluation, led to extensive program statistics activity within operating Bureaus of the Office of Education.

Recognizing the need for better coordination of data acquisition within USOE and with the States, the Commissioner in January 1971 established a data acquisition task force with the Assistant Commissioner for Educational Statistics, Mrs. Dorothy Gilford, as its chairman. The Council of Chief State School Officers established a technical Committee on Evaluation and Information Systems which has worked closely with this task force. The results of those efforts is the "Commissioner's Annual Data Acquisition Plan," which is publicly available as the official guide to planned data collection for the fiscal year.

The National Center for Educational Statistics was established in 1965, based on the recommendations of a distinguished public advisory commission and a White House task force. The Center was intended to provide for education the statistical expertise and products which the Bureau of Labor Statistics provides for labor, the National Center for Health Statistics for health, and the Agricultural Reporting Service for agriculture. NCES is designated as one of the national centers for statistics with responsibilities to the public at large for general purpose data, as well as to Federal officials in both the executive and legislative branches.

Over the years, NCES has suffered from a lack of funds and staff commensurate with its mission; indeed to meet the expectations for educational statistics would require resources several times those that have been available. On several occasions, administration budget requests for funds to expand the NCES capability have been severely cut by the appropriations enacted. In fiscal year 1974, for example, we requested $14.9 million but only received $8.75 million in appropriations.

Continuing fiscal and staff limitations on NCES led me to establish a strong priority, early in 1973, for statistical activities directly supportive of Federal decisionmaking. To carry out that priority, the Assistant Commissioner initiated a series of reviews of possible NCES fiscal year 1974 activities by Federal officials.

Participants in the first review included representatives of OE program bureau, of the analysis staffs in OE, the National Institute of Education, the Office of the Assistant Secretary for Education and the Assistant Secretary for Planning and Evaluation. Each participant assigned a relative priority for each program under consideration, and indicated how the more than 100 possible products or services would be used.

In a second review, representatives of all Federal agencies interested in education, meeting as the Statistics Subcommittee of the Federal Interagency Committee on Education, FICE, discussed the program, and each agency gave priorities and uses on the particular candidate projects of interest.

The third phase of our systematic tapping of Federal concerns was obtaining information on the needs of the Congress. We have always sought to be attentive to the needs expressed in committee reports, hearings, and floor statements. Moreover, the Assistant Commissioner for Educational Statistics took the further initiative, last December to arrange for a meeting with Congressional staff members concerning educational statistics. It was a very helpful meeting and the staff members suggested that such meetings be held semiannually. NCES has already undertaken significant additions which were suggested. The "Higher Education General Information Survey" which is now distributed to the institutions of higher education includes for the first time a question which will yield data on tenure of staff. In addition, we have programed the collection of pilot data on the costs of undergraduate degrees by field.

Several steps have been taken to improve the timely availability of educational data. For example, early estimates of summary data are now released many months in advance of the fiscal publications for both higher education and elementary and secondary education. Also, data is being made available on computer tape at various early stages of editing to provide information as a preliminary to the final, fully edited information. This data is also made available to the public through the remote-access computer reference service EDSTAT. Several months before published reports can be distributed this information is available through this service.

I would also like to mention some of the more than 25 new products and services that NCES has initiated. A program of longitudal studies of the effects of education was started with surveys in 72 and 73 of a sample of the high school class of 1972, which will yield important information on the post-secondary education and work experience of graduates as related to their secondary schooling and personal characteristics.

The first directory of noncollegiate postsecondary institutions was complied, and the first sample survey of students, staff, and programs in such institutions was conducted. A program for retrieving census data by school district made possible for the first time the association of socioeconomic data from the decennial Census of Population and Housing with enrollment and school finance data by school district.

A national plan for library statistics has been completed, and a coherent system of library statistics is being implemented. An educational broadcasting statistics program has been initiated. An analysis of college graduates' employment during the school year following graduation, and related studies have been conducted to improve projections of teacher supply and demand. Special studies in school finance have been conducted to contribute to the public policy deliberations in that field. Publications have been issued on the number of pupils in regular elementary and secondary schools having each of 13 handicapping conditions and the availability of special services for these pupils.

A major new initiative, which I would like to emphasize, is the common core of data (CCD) program which appears as a separate line item in this year's budget. I think it is a well-conceived, thoroughly planned initiative to minimize the cost and burden of the data collection requirements which we place on State and local agencies and thereby improve the quality and timeliness of reporting. The plan, which is being developed with extensive State participation, is to define a minimum common core of those essential data elements useful for program operations and policy analysis at local, institutional, State, and Federal levels. We visualize the CCD program aiming towards the same objectives as H.R. 13991.

In summary, Mr. Chairman, our thrust has been to streamline NCES operations and establish priorities to provide the best possible statistical services within a framework of severe resources constraints. The leadership demonstrated by the recently launched initiatives of the Center and the technical competence demonstrated by the many new services and products provided by the Center are evidence that the Center can meet the needs of Congress and the educational community for educational statistics if the necessary resources are made available.

S. 1539 and H.R. 69 would mandate a number of new surveys and studies. We believe that it is inappropriate to mandate specific statistical research projects by statute, thereby limiting the flexibility of those managing the program. S. 1539, for example, would require six: An annual report on the condition of education (from the National Board for Education Statistics established by the bill), a study of relative measures of poverty, a study of impact aid (SAFA), an annual report on the impact and effectiveness of Federal programs, a triennial survey of the needs of school age children, and a survey of children and other persons of limited English-speaking ability.

H.R. 69 would mandate an NIE study of compensatory education, and two HEW/Commerce studies for updating the number of title I children counted. The Office of Education has considered the feasibility of producing this information, and I would like to take this opportunity to share some of our conclusions with you.

First of all, I would anticipate problems in meeting the deadline established in the bills for some of the reports. Also, I think inefficiencies may result because the purpose and scope of some of the reports overlap.

Due to the ordinary lateness of appropriations and delays involved in hiring new staff, I would expect problems in meeting deadlines for any surveys or studies required in fiscal year 1975. These would probably include: the first annual report on the impact and effectiveness of Federal programs (July 1, 1975), the study of impact aid-SAFA (1 year after enactment), the study of relative measures of poverty (1 year after enactment), and the two studies for updating the number of title I children counted (February 1, 1975).

There is a need for coordination between the two houses on those surveys and studies which may overlap. As described in the bills, the House NIE study of compensatory education appears to overlap the Senate triennial survey of the needs of school age children. Also, in the Senate bill the bilingular survey could be subsumed under the triennial survey of the needs of school age children with appropriate sample augmentation for geographical areas with large numbers of people with limited English-speaking ability. NCES estimates that approximately $10 million could be saved by combining these two surveys.

Moreover, the approach taken in S. 1539 which would attempt to solve these problems by creating a separate agency for educational statistics within the Educational Division is objectionable. Based on an internal OE study, I believe that the Senate approach would not necessarily achieve the assumed goal of enhancing the quality, quantity, or timeliness of the data produced. In fact, due to the coordination required and the increased administrative overhead, it could mean that less of the existing resources would be assigned to direct statistical work.

First of all, NCES, like all separate agencies, would tend to take on a life of its own with interests, because of its separateness, which would diverge from the data needs of OE's ongoing programs. This would be reinforced by the composition of the governing board for NCES which has a substantial number of representatives of non-Federal interests.

As a result, there would be a tendency on the part of OE program managers to collect more data, and possibly different kinds of data, than NCES. This would be an unfortunate reversal of the Department's efforts to lessen the respondent's burden of providing duplicative and extensive amounts of data. As the burden on respondents increases, the nonresponse rate increases and the quality of statistics decreases. Furthermore, our need for better educational data is so great, why risk increasing the costs and staff which must go into greater existing statistics?

Second, a separate NCES would have to duplicate many of the support services it now relies on OE to provide. For instance, NCES currently relies on OE for financial and administrative management, automated data processing, and system planning to directly support its program operations. General support services such as budget, legislation, planning, evaluation and personnel are also provided by OE. If NCES were separated from OE, all of these services would have to be developed separately at an additional cost to the Federal Government, but with no additional returns in terms of better data.

Third, NCES provides many direct support services to OE programs which should remain under OE control. For example, NCES does the formula grant allocations for all of OE's formula grant programs, it provides the form design for all OE programs, collects planning and evaluation information essential to program management needs, to mention only a few. I would note that we made more than 100 formula allocations within the last year in connection with possible changes in title I.

I would recommend that the conference committee reconsider these deadlines and areas of overlap.

On the broader issue of how to improve the available educational statistics, the approach of H.R. 13991 is clearly preferable to that of S. 1539. Of course we would be willing to inform the Congress of our activities in collecting specified educational statistics, with or without a reporting mandate, and to work with you in developing our recommendations on the most effective method for the administration of a program to collect, analyze, and disseminate educational statistics. I believe the preparation of such a report constitutes an orderly approach to obtaining a full understanding of the requirements for educational statistics, the level of resources commensurate with these requirements, and the administrative arrangements which will provide the stability so essential in a statistical organization. Accordingly, we fail to see the need for this specific legislation. However, should the Congress wish to enact legislation in this field, we would very much prefer H.R. 13991, which would set the stage for a feasibility report to the Congress.

Mr. Chairman, and members of the subcommittee, this concludes my prepared statement. My colleagues and I would be pleased to respond to any questions you may have.

Chairman PERKINS. Let me compliment you on your statement.

I have several questions.

The Children's Defense Fund has been conducting a very intensive study on the numbers and types of children who are not enrolled in school. They have informed me that:

Except for the decennial census, there are no complete national statistics on the numbers of children who are not enrolled in elementary schools;

In fact, there is no accurate annual data for all the States on the numbers of children enrolled in public schools;

There is also no accurate annual data on the numbers of handicapped children in school or out of school; and

There is no accurate annual data on the numbers of children with limited English-speaking ability in school or out of school.

Also, during our recent markup on H.R. 69, we discovered that the Office of Education was not keeping data on the amount of title I funds which are being used for reading and math. The only estimate which OE could provide us on the question of how much money is being concentrated on the basic skills was based on a sample of title I programs conducted in 1970, and on a more recent sample of only a few States.

I would like to have your comments on these statements.

Mr. OTTINA. There is no other source of information which reports the number of children not enrolled but there is accurate information on the number enrolled. We have recently felt that there is a need to work with the Bureau of the Census and to use their services in obtaining more current information on many issues. We have been working with them and we have asked them to perform in our behalf, special studies on a sample basis to obtain not only the information which you have just mentioned but other information which would provide for us a more current estimate of many of the items we are lacking.

We have made a budget request for funds for this purpose, and we are in progress with the Bureau of Census, working with them, to effect this program.

In the area of the handicapped, we do have a serious problem of lack of full information. This has been brought to our attention recently by members of your subcommittee in testifying on H.R. 70, as I recall.

We have recently received a letter jointly signed by Mr. Quie and Mr. Brademas. We are working with them, and working to develop a plan to improve our data collection on the handicapped.

With reference to your last point, the availability of data on reading and mathematics under title I. As you recall, Mr. Chairman, the projects under title I are projects approved by the State. We have relied upon information for title I and other such programs through a consolidated program report; we do periodically sample the programs, and we sampled this element as well as others, but don't have a comprehensive program.

Chairman PERKINS. The Consolidated Program Information Report was supposed to be a vehicle for coordinating the collection of data on the major elementary and secondary education programs administered by the Office of Education. Data was collected for school years 1969–1970, 1970–1971, and 1971–1972, and yet, I understand that no full set of data has ever been released by OE from this survey.

Is that true? And, if so, why is it?

Mrs. GILFORD. That is correct. Reports were prepared for the 1969 and the 1970 program. The CPIR project was transferred to NCES just 1 day before the 1970 report appeared. We sent that report to the program managers that were involved to ask them to check the results with data which they had compiled from the State reports received by the program managers.

We found a very large number of inconsistencies in the report. The problem of reconciling it was so severe, we concluded that the report should not be made publicly available. It has been used internally in the office by people who can relate the estimates to State data, but we thought it would be misleading to make it publicly available. Data processing for the 1971–72 survey is nearly complete.

Chairman PERKINS. Thank you very much.

Mr. Commissioner, your statement opposes the studies required by H.R. 69. I would like to point out that the committee felt, on a bipartisan basis, that it had to require these studies in order to have better data available for our nxet review of the Vocational Education Act. This data was not available at such time as it was required to be. Do you care to comment on that?

Mr. OTTINA. Mr. Chairman, I tried to emphasize in my statement a slightly different aspect. I appreciate the problems your committee has relative to our meeting the dates required by law. There is however, some overlap in the studies which would be mandated by H.R. 69 and S. 1539. I think we could save a great deal of effort and money by looking closely at what the requirements are.

Chairman PERKINS. Is it correct that within the last several years the Office of Management and Budget has reduced the Office of Education's budget requests for the collection and dissemination of education statistics? Could you provide for the record a chart showing the Office's budget request for educational statistics for the last 5 years?

Mr. OTTINA. Mr. Chairman, I have a chart before me that does a little more than that. It does it for 6 years and shows the appropriation process, which would be useful for your study.

Chairman PERKINS. Without objection, the chart will be inserted in the record.

[The chart follows:]

NCES: DATA SYSTEMS IMPROVEMENT PROGRAM APPROPRIATIONS FOR FISCAL YEAR 1970–75

[Dollars in thousands]

Year	DHEW request	President's budget	Appropriation
1970	2,200	2,000	1,900
1971	4,000	4,000	3,000
1972	4,000	3,250	3,250
1973	[1] 29,900	[1] 14,900	[1] 13,900
1974	31,050	14,900	8,750
1975	24,570	11,600	------------

[1] Includes $1,000,000 for transfer of the educational manpower statistics program from EPDA, and includes $7,000,000 for transfer of the national assessment of educational progress from NCERD.

Chairman PERKINS. Mr. Bell.

Mr. BELL [presiding]. Thank you, Mr. Chairman. It looks like the Republicans have taken over this committee.

It seems to me there is a basic problem in that educational statistics, according to the Senate bill, would be handled by a separate entity and then placed over to the OE.

Now, it is my understanding that this would aggravate the situation—both from your statement and from what I have learned—because the problem seems to be that OE, even if it gets the statistics, does not, sometimes, adequately follow through and do something about these findings.

Second, there is some question as to whether the statistics get to OE in the right form. There appears to be a lack of coordination and a lack of accomplishment in both ends of the spectrum.

It would seem that the Senate version would aggravate this situation. I do not mean to be critical of your situation, nor do I mean to be critical of the statistical department, but I believe various problems do exist.

Wouldn't the Senate version of the bill tend to aggravate the problems we are experiencing, relative to educational statistics?

Mr. OTTINA. I believe it would aggravate it. The criticism you are trying not to make is warranted. We do have problems with statistics, we have tried very hard to correct them.

One of the problems has been duplication. Part of the reaction which occurred about 3 years ago, was that there were some units collecting statistics and asking the same people to respond; they threw up their hands and said, "We will just stop giving the information." That caused us to control requests.

As you point out, if we again try to separate those activities, much of the work that OE does in managing and running its programs relies very heavily on sets of information integral to the operation of the program which Mrs. Gilford's staff works with. Her staff formulates the programs as indicated earlier.

Mr. BELL. I believe that this is a very important problem. In the study of the formula and problems we have had in the Elementary and Secondary Education Act, we were in constant despair because of the statistics. Nobody could get the exact story told in an area we thought was right. We always were second-guessed.

This is a very important problem, and I am hoping in our conference that the Republicans and Democrats from the House will stand on the issue.

Mr. OTTINA. One of the things that does not often come through is that the collection of statistics is really a voluntary effort on behalf of the respondent. They are not paid, and it's an effort they provide upon request. They often get concerned as to how much data they provide and how much resources are going into filling out of data forms.

One of the things that often happens is that the data is just not usable to start with, and we go through many, many cycles in the process of editing, remailing, inquiring if they can update what they have given us. This part of the process is perhaps the most time-consuming. This is one of the notions that leads us to the common core of data so data can be more useful to decisionmakers and policymakers.

At one time, we thought we might have a program of shared expenses in terms of the fiscal resources that are required.

I think both of these ideas are feasible.

Mr. BELL. Mr. Ottina, I have more specific and detailed questions that I would like answered.

How can information be made available more quickly?

Can sampling techniques be used more often?

Which users require full universe data?

Mr. OTTINA. We have implemented a program where we now try to release at an early stage, with proper identification, data which has not been fully edited.

As I mentioned earlier, our greatest problem is cleaning up the data. So now, during various stages of the editing process we have data available and release it, as early as possible.

We also have developed a system where much of the data is on tape and is computer-readable. We do have the services of a computer which is available, which an institution can plug into for a very,

very nominal cost. This cuts down time in terms of printing and transmission and also makes it immediately usable if the user has a computer.

Early sampling could be used in some areas. We have requested funds for what we call a quick survey activity. Surveys are not possible when we are allocating funds or using the information for decisions in which dollar allocations are being made.

Your last question, perhaps we can submit for the record an answer to that.

Mrs. GILFORD. The general area where we are most frequently asked for full universe data is in the area of higher education. By the time you make all the requested cross-classification of data, the sample required would be so great that it is essentially the universe of data.

Mr. BELL. Thank you.

How many personnel were assigned to the NCES each of the last 5 years? And what was the budget of that fraction?

Mr. OTTINA. Beginning in 1970, I believe we had 154 in 1971; 146 in 1972; 153 in 1973; 153 in 1974; currently we have 169 personnel.

Mr. BELL. Would you give me that again?

Mr. OTTINA. 1970, 154; 146; 153; 153; 169.

The 169 was as a result of our allocation of resources to NCES most recently, because we felt we needed very much to beef-up our statistics.

Mr. BELL. Do you have any facts on the budget?

Mr. OTTINA. In 1970, the President's request was $2 million, the appropriation was $1.9 million. In 1971 the request was $4 million and the appropriation $3.0 million; in 1972, $3.25 million, the same as the appropriation, in 1973, $14.9; the appropriation $13.9; and last year $14.9 was requested, and the appropriation was $8.75.

We have had in this area a very difficult time with appropriation committees.

Mr. BELL. Your anticipation, I suppose, was a little bit confused by virtue of the fact that the appropriation was so much lower.

Mr. OTTINA. Part of that was the great concern expressed by the number of constituents receiving several data requests. I think we have come a long way in that direction, and I think if you talk now to the chiefs, they will be much more supportive of our efforts in collection of data.

Mr. BELL. Is it posssible for NCES to have its own computer capability?

Mr. OTTINA. There is a single computer center supported by DHEW, and we are to use that center.

Mr. BELL. How much time is lost and how many requests can not be filled because of the limited access to these computers?

Mrs. GILFORD. We fill most requests for data; we receive a very large number of requests each year. We receive about 11,000 requests for data each year, and we fill approximately 1,000 requests for data tapes each year. We have not had the capability to do special analyses for individuals, but if it is a straight request for data which has been published, it's filled very quickly, or if it's a request for a copy of tapes, that is done immediately.

Mr. BELL. You feel you have filled most requests?

Mr. OTTINA. Yes.

Mrs. GILFORD. There are many requests for data which we don't have and don't have the resources to collect.

Mr. BELL. Did you say it was possible for you to have your own computer capabilities?

Mr. OTTINA. There is a single departmental computer which we are required to use and which our contractors are also required to use if time is available.

Mr. BELL. What methods of cooperation exist between OE and State departments of education?

Mr. OTTINA. There is a joint committee which meets, and during these meetings data collection is discussed, and every item we propose to review is discussed.

Mrs. GILFORD. There is a standing committee called the Committee on Educational Information Systems. This committee has one representative from each State and it meets several times a year. The Center staff and OE staff responsible for data collection meet with them. The Committee has half a dozen subcommittees working with the Office of Education. They are extremely helpful to us in telling us the problems the States would have in filling out the forms, also very helpful in getting forms filled out by the States and returned to the office in a timely way.

One of these subcommittees is a committee on data acquisition. A group of State people come in and review the individual forms we plan to use the next year. They report to the chiefs on the plan, and there is actually formal agreement made between the OE and the council of chief State School on the data which will be collected in the following year. That agreement is made after State personnel have gone over the forms for the problems which might be incurred by the States.

Mr. BELL. I hate to mention this, but my Los Angeles school system had a problem with OE, relative to a civil rights matter. The schools felt they were in compliance. It was sort of a reverse civil rights situation.

There seems to be a complete lack of coordination between OE and the Los Angeles school system, which I think is the biggest school system in the Nation.

Mr. OTTINA. The enforcement of civil rights is not within our province. The only one I am familiar with is in terms of faculty assignment, and I think Mr. Johnson did attempt through correspondence with us to develop a plan which I think finally was to have met that problem.

Mr. BELL. That did become quite a serious situation and we lost what I felt was our share of money.

This does deal, of course, with the coorperation which exists. It would seem to me that this would be a very important situation.

Is it possible for congressional officers to have access to basic data through our own remote terminals.

Mr. OTTINA. Yes.

Mr. BELL. Is there any adequate advisory group to assist OE in its dissemination problem?

Mr. Ottina. Not as of today. We do have a number of advisory groups we work with, for instance the one Mrs. Gilford described.

Mrs. Gilford. We also convene a group of representatives from higher education. We have similar planning on data collection about libraries. These meetings are not as formally structured as the CLSSO committee. We also meet with a subcommittee of the Federal Interagency Committee on Education each year to coordinate Federal Agency data requirements.

Mr. Bell. Does OE share data collected with others?

Mr. Ottina. Yes, in both directions. As I mentioned in my statement, there is a Federal Committee, FICE, which has about 27 members. Mrs. Gilford works with that committee to assure that their needs for data are met as fully as possible.

We also work with a number of groups in order to obtain data from them.

Mr. Bell. I assume that OE does have data on OCD.

Mrs. Gilford. We do run a survey on preschool education. We get information on participation, and we are able to classify that by the various socioeconomic factors collected in the CPS.

We know the increasing trends for early childhood education. We have an annual publication on this.

Mr. Ottina. This might be interesting for the committee. This is an inventory which is a statement of what we produce. That may be helpful.

[The booklet, "Projects, Products, and Service of the National Center for Education Statistics" is retained in the subcommittee files.]

Mr. Bell. How about grants to colleges and universities?

Mrs. Gilford. We do occasionally get requests from individuals for such information, and we furnish Xerox copies of tables from NSF reports when they are requested.

Mr. Bell. The same thing for the arts humanities?

Mrs. Gilford. We do not collect information on that. The long-range plan for EDSTAT provides for inclusion of fiscal data on all Federal education programs in the data base.

Mr. Bell. What analytical capabilities exist in OE for the interpretation of aid?

Mrs. Gilford. This has been a rather long-standing problem in NCES. When Commissioner Howe hired me, he asked me to suspend data analysis until the backlogged data has been published. He thought it was more important to get the data out. Once we had reached a better situation on timeliness than there was at that time, I discussed with an advisory group the disinability of the center doing some analytic reports. Their reply was that it was more important in general for NCES to produce the data than to do the analysis.

We also entered a period of about then when there was a freeze in the office and we couldn't hire staff for a period of months. Then there was a period we couldn't hire except from within the office because of the reorganization. For a period of about 2 years we were not able to hire the technical expertise needed for analysis.

We have requested staff positions for an analysis capability in NCES, and we hope to start that activity in fiscal year 1975. Analysis is an essential part of a well-rounded statistical program, there is no question about that.

Mr. Bell. Is there a central repository in OE for data?

For example, does NCES have data on impact aid, title I allocations?

Mr. Ottina. There is a location where we have that information.

Mr. Bell. A central repository in OE for this data? For example, are there figures on title I data and other related programs?

Mr. Ottina. It depends on the kind of data you are talking about. The formula allocation information is computed through a service NCES provides to the rest of the office. Now, once you have that information, the program itself would have additional information as to the program's operation. So I think it would depend on the kind of information being requested.

In terms of impact aid, generally speaking, it's in the office of the program for impact aid, and they have only certain kinds of information.

Mr. Bell. You don't have a central repository for impact aid? Those are handled by individual departments?

Mr. Ottina. I was trying to differentiate between impact aid funds and title I funds.

Mr. Bell. But your answer is essentially no, is that correct?

Mr. Ottina. Yes.

Mrs. Gilford. During the past 15 years there has been a very active group working on standard terminology for use in education. That group has produced eight handbooks of terminology for use in elementary and secondary education: handbooks which were developed in conjuction with participation of all the States, and we do use these standard definitions in the Office of Education.

We are also working to develop comparable standard terminology in the area of higher education and have published manuals on finance, physical facilities, and so forth. These are widely used by the higher education institutions in the country on a volunteer basis and the terminology is used in all HEGIS surveys.

Mr. Bell. H.R. 69 results in a great deal of data and information in connection with title I. How would you anticipate this information being used?

Mr. Ottina. I think the main use would be better understanding leading to policies on how the program should be operated. It will provide us with a great deal of insight as to how the program should be modified in future legislation. It should give us an insight as to what is effective and what is not, and generally, some very useful information which will enable us to study the program as a whole which has been one of the shortcomings of our evaluations of title I which have been primarily State evaluations, small pieces of the program, rather than the entire program.

Mr. Bell. What is the OE budget for statistics as compared with other departments?

Mr. Ottina. Generally speaking, it's a very small budget compared with the others. We do have data; unfortunately it is rather old.

In the particular data I have before me, for example, health statistics, almost $15 million and labor statistics almost $30 million compared with $6.1 million for NCES. These figures have changed; but the relative sizes have not. But equally important, perhaps more important in many ways, is the staff which supports it and looking at that during the same period of time NCES was 160, labor statistics had a staff of 1,562, census 3,724.

I think another element that, I am sure, as you talk to other witnesses will come out, our statistical organization is much more related to program operations in terms of development of information. The center serves the Office of Legislation by doing allocations for formulas under legislation consideration and is responsible for the application of formulas for the distribution of funds.

Mr. BELL. Do you want to comment on that?

Mrs. GILFORD. I would like to comment on the staff size. In a sense there is a critical mass for a statistical organization. You have to have an adequate number of clerical staff. If you don't have staff of sufficient magnitude, it's going to take many times as long to produce the data as it would with a larger staff. I think the most serious problem is that we have not reached the critical mass.

Mr. BELL. Does NCS have an ongoing relationship with Bureau of Census which permits you to use information from decennial census or any other collection or educational information?

Mrs. GILFORD. Before the decennial census is undertaken we interact with them on the education items. We also collect data through the current population survey. It's through the CPS mechanism that we get data as to participation in adult education and also the preprimary education statistics. We have recently done a study through CPS of the employment of 1972 college graduates the following fall.

Mr. BELL. What is the average lag between the time you send out questionnaires gathering data and the time the data is published?

Mr. OTTINA. Our average is 26 months.

Mrs. Gilford is correcting me. The 26 months is the age of the data. We will request data as of, let's say the 30th of June, and we will establish a due date which is typically 3 months later. Follow-up of nonrespondents may take another 3–6 months. We then go through a process of editing. That is the most time consuming activity. Sometimes that process, itself, takes 8 to 12 months; we then tabulate and review it, that takes another 3 or 4 months or so.

Then we send it to GPO for printing. Our range would be somewhere from around 9 months to as much as close to 4 years. The mean from the as-of date is what I was quoting, which was about 26 months.

Mr. QUIE. 26 months? That is the time from when you started collecting until you start publishing? How old is that information it takes you 26 months to get?

Mr. OTTINA. The 26 months is the date at which the information is frozen; let's have the number of buildings as of 30 June, and so forth; it's 26 months from 30 June.

Mr. QUIE. Is there anyway of speeding that up? That is one of our problems. You are talking about ancient history.

Mr. Ottina. You are absolutely correct. The most difficult task we have is going over the data we get from the respondents, editing and checking it, and that process often will consume three-quarters of the time we are talking about.

It's in that vein we have implemented the system of allowing information to be released at different points in the editing process with decreasing accuracy the earlier. We release it, but it's in that sense we think we can provide for national pictures data which will not have XYZ perfectly, but if you look at the whole picture, it will give you information sufficiently to get an idea as to the total picture.

The other elements are very difficult to do much with in many ways other than as I mentioned earlier, we do provide data through tapes rather than going through the printing process, and that can cut down 2 or 3 months as well, but that requires that the recipient have the ability to deal with the data.

Mr. Quie. To what extent have you brought States together to try to develop a standard mechanism of recording information? For instance, if you wanted to get enrollment figures as of June 30, then each of the States could be sending it in to you. The States can secure that information a lot faster than you are talking about.

Mr. Ottina. In the program we have initiated, the common core of data, the purpose was to achieve that kind of understanding with each of the States and to try to develop data which would serve their needs as well as our Federal needs. That is a program for which we have asked Congress for funds 2 years. We hope it will be funded this year.

Mr. Quie. In other words, you are saying the Congress has not given you funds you have asked for?

Mr. Ottina. Yes.

Mr. Bell. Three reports have been made in recent years as to the statistical capabilities of OE—the Kelly Committee, in 1971, Joel Berke had a study on school financing in 1973, and the Newman Task Force released a paper dealing with particular problems in higher education. What has been OE's response to specific recommendations in these reports?

Could you supply a point-by-point answer to that for the record?

Mr. Ottina. I will certainly try.

[The documents referred to follows:]

Question: What was NCES' Response to the Joel Berke Study on School Financing?

NCES was not asked to make a written response to the recommendations of the report on "Improving Information Systems for Educational Policy Planning." The subject report was prepared by Robert J. Goettel and Joel S. Berke of Syracuse University, for the President's Commission on School Finance in December 1971. NCES has proposed programs or taken actions to meet many of these recommendations. The specific recommendations of Chapter VI of the reported are presented in sequence with information concerning the NCES response:

1. *Data about American education must be analyzed—by an analytical staff located in the National Center for Educational Statistics.* A major component of the NCES Common Core of Data (CCD) program is the provision of an analytical capability through an in-house unit, supplemented by contract. Manpower and budget limits have prevented full implementation. The NCES FY 75 budget proposes an analysis of cost factors in providing undergraduate educa-

tion and a study of the impact of changes in the price of resources upon the cost of operating programs. Recent or current analytical projects directed toward policy makers include *Profiles of School Support, Urban Finances, School Resources and Community Characteristics, Output Indicators of Elementary Secondary Education,* and *Teacher Supply/Demand System.*

2. *To guide improvement in NCES information gathering, analysis and dissemination, an advisory committee should be created.*

In October of 1972, NCES made a request to the Commissioner of Education to approve a National Advisory Committee on Educational Statistics. After an extensive dialogue and period of negotiation, the request is now under consideration in the Office of the Secretary of Health, Education and Welfare. In the meantime NCES has used several ad hoc advisory groups of important users to assist in selecting items to be collected and in determining the manner in which data are organized and presented.

3. *Ultimately, however, independent, continuing, in-depth analysis of the state of American education and educational finance will come only from a body roughly comparable to the National Bureau of Economic Research.*

NCES proposals to establish an in-house analysis capability as part of the CCD program have not yet been funded. To date only planning funds ($500,000) have been made available for CCD.

4.1.1 *General purpose data—those which are currently collected by the NCES to inform the nation about the "condition and progress of American Education"—and data required for program management purposes—those data which are often required by legislation for monitoring Federal aid programs—should be integrated.*

A study is now underway to determine the feasibility of integrating NCES and Federal program data elements in the Federal core of an elementary and secondary data base, a module of CCD. Plans for a post-secondary data base also includes such a merger. A Data Acquisition Task Force coordinated by NCES is now inventorying and reviewing data requests, forms, and individual data items for all units in the Office of Education.

4.1.2 *Consistent with 4.1.1, the "Belmont" Project (Consolidated Program Information Report (CPIR), Elementary School Survey (ESS), Secondary School Survey (SSS) which was designed to collect program evaluation information should be assigned to NCES. NCES staff should conduct a thorough review of all components of Belmont to assess the extent to which the entire project can, with modifications, serve policy information needs.*

The "Belmont" Project has been transferred to NCES. A study in FY 72 developed program policy questions for 8 major OE programs in elementary and secondary education to provide a basis for revising the CPIR, ESS, and SSS studies. New versions of the CPIR and ESS have been produced.

4.1.3 *NCES should assign data collection specialists to a given number of States with responsibility for supervising the collection and integration of data about these States for State Education Agencies and other Federal agencies.*

This action was proposed as an integral part of the CCD in the F Y74 budget, but funding was not forthcoming.

4.2.1 *Continuing support must come from the Commissioner of Education and, when necessary, from the Secretary of Health, Education and Welfare for strengthening the links, between the various agencies collecting education data.*

The Federal Interagency Committee on Education (FICE) is supported by the Assistant Secretary for Education of HEW. The FICE subcommittee on Educational Statistics serves as a forum for identifying Federal agencies data requirements and to coordinate development of standard terminology and to assess feasibility of central files of educational data. The Office of Management and Budget has the responsibility for coordinating the collection of education data.

4.2.2 *All Federal agencies that request data from State and Local Education Agencies should have requests approved and processed by the NCES forms clearance operation.*

NCES has followed this precept, but other Federal agencies sometimes violate the policy.

4.3.2 *USOE procedures should be designed to encourage integrating general purpose and program data within the States.*

This has been proposed in the long-term plans for CCD, *but the* State core has not been funded.

4.3.3 *All routine data requests from USOE should require State compliance.*

Current legislation does not permit this policy.

4.3.4 *The cost of providing the Federal government with information beyond those normally undertaken by State education and local school districts should be assumed by USOE.*

NCES is pursuing a policy of cost sharing with the States on the CPIR and Elementary and Secondary General Information Survey (ELSEGIS) propects. A much larger effort under CCD has been proposed by NCES but has not been funded.

5.1 *The USOE should have personnel on the staff of NCES trained in demography, economics, education, public finance, sociology and other areas of social expertise in order to perform analysis of data.*

NCES has all of the cited skills on its saff. but cannot utilize these skills completely because of manpower shortages for basic data acquisition and processing.

5.2 *NCES should have an editorial staff assigned responsibility for insuring readability and clarity 'of publications.*

The NCES publications branch has been expanded since the subject report was published.

5.3 *NCES should have responsibility for analyzing only ongoing, routinely collected data, including data collected as part of program management activities within the Office.*

NCES staff limitations allow only minimal analysis even for routinely collected data. NCES sponsors collection and dissemination of data for the National Assessment of Educational Profiress and the National Longitudinal Survey with minimal analysis.

6.1 *The first series (of publications) would be a computer listing including tables of all data regularly collected about elementary and secondary education.*

NCES now publish such a series.

6.2 *The second series (of publications) should be directed at readers who are laymen—policymakers, citizens, etc.—and would include considerable analysis.*

NCES is now only able to publish a limited number of such analyses.

Question: What has been the Office of Education's response to the recommendations of the Kelly Commission?

The NCES staff worked actively with the Kelly Commission and were eager to respond to the recommendations. The Assistant Commissioner for Educational Statistics requested the following memorandum dated May 13, 1970 on plans for implementation. It was used as the basis for a 5 year plan and for a FY 71 supplemental budget request. The supplemental budget request was not approved. The Center also requested an increase of funds and staff for these activities in its FY 72 budget which was not approved. The Center also requested an increase of funds and staff for these activities in its FY 72 budget which was not approved. The Center however, did undertake, within the constraint of its limited budget, to respond to the Committee's recommendations.

The portion of the specific recommendations of the Commission to which the Center was able to respond are presented in sequence (the memorandum cited above follows the discussion of the recommendations):

3. *USOE should begin now to solicit proposals for studies comparing ELSEGIS data from the 1970 Census of Population and Housing when those data are available.* The relevant subrecommendations abstracted from the body of the report are: (1) Complete the project of mapping school districts against Census housing and population tracts; (2) Compare ELSEGIS data with the 1970 Census of Population and Housing for publication; (3) Develop new school accounting methods and formats for LEAs.

The project of mapping school districts against Census housing and population tracts was completed; using these maps to retrieve Census data by school district, the Census social and economic data was merged with financial and staff data from the Elementary and Secondary General Information Survey (ELSEGIS): Handbook II, *Financial Accounting for Local and State School Systems* was revised and published.

4. *Expand ELSEGIS and other OE surveys to include Federal Program not administered by U.S.O.E.*

Relevant questions were added to existing surveys.

5. *Expand ELSEGIS sample to include a separate survey within all SMSA's in which the largest 100 central cities are located.*

The purpose of this recommendation was to permit analysis of the finances of suburban and urban school districts. The Center immediately undertook to do so some of the proposed analyses for existing data on 87 large urban school systems. An analytic report, *Finances of Large City School 1967–68: A Comparative Analysis*, was published.

The Center was unable to respond to the other recommendations because of the lack of resources which the Commission recommended be provided for these studies.

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE,
OFFICE OF EDUCATION.

Date: May 13, 1970.
Reply to Attn. of: **DSPA/ESSB.**
Subject: Implementation of Recommendations by Committee on Educational Finance Statistics.
To: Mrs. Gilford, Assistant Commissioner for Educational Statistics.

1. The report of the Committee on Educational Finance Statistics contains some very thoughtful recommendations based upon a comprehensive analysis of both the present state of our finance statistics data collection program, and the types of data required by educational decision makers and researchers. Some extremely relevant issues are raised. In fact, the entire report may be viewed as an attempt not only to infuse our statistical program with greater relevance, but to provide information which may influence thinking on the methods of distributing aid to schools and school districts.

2. The increased precision and sophistication of our data that would result from implementing the Committee's recommendations would provide useful information for decision makers, in particular OE administrators, to better assess both the fiscal and educational impact of Federal programs. A complementary effort would be the encouragement of State and local officials to improve their own statistical systems, thus providing more detailed information at those levels.

3. It should be noted that only with extensive State and local participation and support can we hope to implement the majority of the recommendations. In some instances, the data are not presently being compiled at any level. Further, the accounting systems of many local school districts do not provide such sophisticated data. Therefore, if these recommendations are implemented, their effect upon State and local statistical programs will probably be greater than the effect on our Federal statistical program. Implementation at the national level largely depends upon the restructuring of State and local programs, which will probably occur at different rates in the 50 States.

4. The Committee's recommendations present an opportunity to revitalize the interaction among Federal, State, and local statistical units, to re-evaluate present information systems, and to more equitably share the burdens of these data gathering efforts that have expanded so rapidly in recent years. In particular, they afford an opportunity to determine at what level data should be aggregated for decision making purposes. Some of the Committee's recommendations raise this issue.

5. It would appear, based upon initial review, that National aggregates are not required for some data items but are needed primarily by State and local administrators. In such instances we should not collect information irrelevant for current Federal decision making but encourage State and local administrators to obtain the data. This issue could be properly resolved upon more extensive analysis.

6. If the recommendations of the Committee are adopted, this report may be viewed, in later years, as a significant milestone in the development of relevant financial statistics in OE. It implies that the Center will greatly accelerate its efforts to relate non-educational variables to basic educational data so as to obtain more relevant information needed to make specific decisions.

7. This increased relevance however has a price tag. Additional resources are necessary to do the job. Money, in the form of contract support, and highly

skilled professional manpower are required. We have attempted to estimate the costs of implementing the Committee's recommendations in the following analysis. We feel these are the minimum requirements that will allow the Center to fulfill the Committee's recommendations and meet the additional tasks that will inevitably develop as they are implemented without jeopardizing the development of important segments of our present program.

8. There are four major methods by which we can accomplish all aspects of the Committee's recommendations: (1) expand some of our present surveys, (2) initiate new surveys and developmental studies, (3) devise ways of utilizing data collected from other sources, such as the Bureau of the Census' tabulations from the 1970 Censuses of Population and Housing and the planned 1972 Census of Governments, and (4) increase our technical and financial assistance to State and local educational agencies. Some of the specific ways each of the recommendations may be implemented and the estimated costs are described in Table 1 attached.

9. Some of the Committee's recommendations are complex and will require considerable planning, study, and review by NCES staff to initiate. In addition, NCES will have to wait for tabulations of the 1970 Census data on population and housing to proceed with some of the suggestions. Implementation of these recommendations will probably be completed within five years. During these next 5 years we estimate that NCES manpower needs to accomplish all the recommendations will be as described in Table 2 attached.

10. In addition to phasing the implementation of these recommendation over the next five years, we are examining our present ability to make an immediate response to some of the recommendations. Valuable financial and staff data for local school systems is now available on a sample basis from ELSEGIS I and is being collected for ELSEGIS II. If subjected to comprehensive analysis, these date would provide information that would be invaluable to decision-makers.

11. Based upon the meeting with the Committee in December, our staff has already initiated some of the proposed analyses using data from ELSEGIS I and State School Systems surveys. Analytical tables have been prepared comparing expenditure and revenue data for 87 large city school systems with similar data for the States in which they are located. This analysis is now undergoing review and should be available in published from later this summer.

12. In the preparation of these tables the need for expert consultation was emphasized. Our present staff, lacking the required time, were unable to perform the complex analyses and to investigate fully the non-OE sources that would have made this pilot effort even more valuable. It became very apparent that if we were to make an immediate response, we would require the services of an urban finance expert to provide these highly technical skills.

13. At the recent National Conference on School Finance in California, we attempted to compile a list of experts in the field of school finance who might be interested and available for personal service contracts with NCES. These efforts disclosed that there is not only a scarcity of educators proficient in this area, but that those who are experts are already fully committed to other projects.

14. As an initial step we suggest that an expert in school finance be recruited to serve on a long term basis. This would provide immediate assistance for analysis of the data from ELSEGIS I and ELSEGIS II. Also he could train our present staff in the techniques and procedures required to perform the complex analyses necessary to implement the committee's recommendations.

15. The recently established President's Commission on School Finance is charged with studying the adequacy of present data collection concerning the distribution of Federal, State and local educational funds among States, districts and within districts. We anticipate that this will mean many requests to this office for information. The addition of an expert in school finance to our staff along with the additional training he will provide to other members of our staff will allow us to respond fully to these inquiries.

16. We enthusiastically endorse the report of the Committee. Assuming that the necessary resources would be available, we are eager to initiate the implementation of the recommendations as soon as possible.

CAROL J. HOBSON,
Chief, ESSB.

TABLE 1

Recommendation	Method of implementation	Year of implementation	Year-by-year cost for each recommendation (in thousands of dollars)					
			1971	1972	1973	1974	1975	Total
(1) Development and publication of a set of common denominators relevant to issues in American education with comparisons between State and local data on these denominators.	Expand the present ELSEGIS survey and present it along with relevant OE program information and data from such sources as census, ACIR and national assessment.	1972	30	90	100	200	300	720
The development of criteria for stratification of schools and school districts along the denominators and development of workable index of poverty.	Contract with universities, research institutes, etc. to develop such a criteria and index.	1972	100	100				200
(2) Combine USOE data with local government data from the census of governments.	Contract with a university or other group to analyze ELSEGIS, State school systems and Belmont data with data compatible from 1972 census of governments. Data from ACIR may be compared with ELSEGIS I data for coterminous areas to provide initial analyses. Full implementation will have to wait for the completion of the 1972 census of governments. (It should be noted that the present mapping project for the 1970 population census will not facilitate comparisons between ELSEGIS school systems data and census of governments data.)	1975	100	100	300	500	500	1, 500
(3) Project of mapping school districts against census housing and population tracts.	Is presently being done on contract and is part of DSIS's 5-year plan.	1972	300	200				500
Research in the development of usable techniques for comparing census of population and housing data with ELSEGIS data.	Would be a special project to be done by contract	1973	500	500	500	200	200	1, 900
Comparison of ELSEGIS data with the 1970 census of population and housing for publication.	Implementation of the techniques mentioned above	1974	50	100	150	200	100	600
Development of new school accounting methods and formats for LEA's; and revision and implementation through handbook II series in OE technical assistance to States and LEA's.	Is presently being included in DSIS's 5-year plan. The effort for this project will be greatly intensified by many of the other recommendations included herein.	1975		200	175	400	450	1, 225

TABLE 1—Continued

Recommendation	Method of implementation	Year of implementation	Year-by-year cost for each recommendation (in thousands of dollars)					
			1971	1972	1973	1974	1975	Total
(4) Exapnd ELSEGIS and other OE surveys to include Federal programs not administered by USOE which are administered by schools and school districts.	Incorporate relevant questions into the present questionnaires for these surveys.	1972		15	15	15	15	60
Collect data concerning funds administered to school-age children within an attendance area by agencies other than the local schools.	Contract for a feasibility study the first 2 years to determine whether enough funds are distributed this way to make it worth the cost of collecting this data.	1971	100	100				200
(5) Expand ELSEGIS sample to include a separate survey within all SMSA's in which the largest 100 central cities are located.	Initiate a subsurvey of the ELSEGIS survey to generate data for SMSA's in which the largest 100 central cities are located to make intra-SMSA comparisons.	1973	100	150	250	250	250	1,000
(6) Expand the ELSEGIS survey sample size.[1]	The sample size of the ELSEGIS survey has already been increased for the 1970–71 survey.	1971	100	100	100	100	100	500
(7) Collect data at the individual school and administrative unit level on educational program, pupil population, personnel, revenue, expenditure, and outputs for a random sample of schools in large cities.	This would require widespread promotional work and extensive resources to initiate this developmental project through a contract. (This is dependent upon the development of workable criteria for the stratification of schools according to school and community, social and economic characteristics as described in recommendation No. 1.)	1975			100	300	500	900
(8) Collect and publish State data on an annual basis and by Federal title as well as by Federal act.	Expand the State school systems survey and conduct it on an annual basis instead of on the present biennial basis, so that comparisons can be made with ELSEGIS data.	1972	20	50	50	50	50	220
(9) Develop mechanisms to coordinate USOE data collection activities with those of other agencies in the Federal Government that are in a position to provide USOE with useful data.	Create a full-time position of liasion with other statistical agencies.	1971	20	20	20	20	20	100
Total			1,420	1,725	1,760	2,235	2,485	9,625

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[1] Excluding expansion of Belmont.

TABLE 2.—NUMBER OF STAFF BY LEVEL REQUIRED EACH YEAR

Level of staff	1971	1972	1973	1974	1975
Senior professional	5	5	5	5	5
Junior professional	2	4	5	5	5
Statistical clerk	2	3	5	5	6
Total staff	9	12	15	15	16

Question: What was NCES' Response to the Newman Report?

The Newman Report's chapter on *Data and Decision Making* was, in large part, consistent with the documented plans and recommendations of NCES management. Accordingly, our response made clear that the report reinforced the attitudes and directions which the Center had established for itself. At the same time, however, we felt that it reflected insufficient awareness of ongoing NCES efforts to move the statistical program forward in the very directions advocated within the report. We therefore responded with evidence of our activities and accomplishments in these directions.

For purposes of conveying to this Committee the substance of our response to Newman, the extensive array of information which we supplied about our programs may be grouped into three separate but closely related categories: (1) Efforts to fill in data gaps; (2) Increased timeliness of statistical data in response to user needs; (3) Increased policy-relevance and analysis.

A brief summary of each of these categories follows. In some instances, relevant information has developed subsequent to our response to the Newman Report; we have included such information, in the belief that it may be useful to the Committee.

(1) *Efforts to Fill in the Data Gaps*

A recurring theme of the Newman Report is the need for longitudinal studies; we welcomed the opportunity to provide information on progress of our pioneer Longitudinal Study of Educational Effects, based on the high school class of 1972. The report did state that a longitudinal study had been "recently launched" by NCES. However, we noted that an important fact was missing: active work on this project had been begun in 1969. Furthermore, base-year data on personal and school characteristics of a national sample of high school seniors had been collected in Spring 1972—long before the Newman Report appeared in print. At the time we responded to Newman, plans for the first follow-up survey of these students were well along, and a pretest questionnaire was ready to go into the field. This first follow-up, launched in fall 1973, was successful to an unprecedented degree; we were able to locate and to obtain information from some 95 percent of our sample of 1972 graduates. We are currently carrying out a field test preparatory to our second follow-up, scheduled for fall 1974. Since our follow-up questionnaires are in no way limited to information on participation in *higher* education, we expect to have some challenging new information on the total spectrum of post-secondary experience, needs for which were expressed so forcefully in the Newman Report.

Several major data collection efforts which focus specifically and exclusively on the postsecondary sector other than traditional higher education were also stressed in our response to Newman. We noted, for example, our survey of characteristics of postsecondary career schools which culminated in the publication of our directory of postsecondary institutions other than higher education, the first directory of its kind. In addition, we cited our first-time survey of enrollments, programs, and other data for a national sample of these noncollegiate institutions. Data collection efforts are just now being completed on the latter survey with responses on hand for approximately 95 percent of the institutions in the sample. In view of advance expectations of reluctance on the part of proprietary institutions to share information, this response rate is gratifying indeed. Other efforts which we cited as having a bearing on the "other postsecondary" sector included our surveys of programs providing adult education through public schools, of the educational role of nonprofit community organizations, and of the characteristics of individual teachers and students in vocational education. As we noted in our response, the issues addressed by this program of activities in the noncollegiate sector were identified by NCES in 1970 or earlier, long before the Education Amendments of 1972 or the Newman task force focused attention on that sector of education.

The Common Core of Data program (CCD) is another example which we cited to document our efforts in filling data gaps at the postsecondary level. This major new initiative was formulated by NCES to provide Federal leadership in developing integrated information systems to meet Federal, State, local, and institutional needs for policy-oriented data. A fundamental premise of the CCD program was that data collections should be directly related to information needs, which, in turn, stem from major issues and policy questions facing USOE. We did inform Newman of our CCD plans, but in our spring 1973 response, we did not fully foresee the direction of near-future events. Briefly, our efforts to assess needs of USOE Bureaus in connection with the CCD program indicated that there was a most urgent and immediate need for surveys of USOE target populations at the postsecondary level; that is, queries to subgroups of special concern to USOE that were not enrolled in any education institution, probably reachable only through a survey of a sample of households. In response to this expression of need, we initiated plans for a "population survey" to be carried out in FY 1975 or FY 1976, depending upon budgetary allocations. A critical aspect of our plan was a preliminary survey in May 1974; this preliminary survey is not only a pilot test of methodology and instrumentation, but it is of sufficient scope to yield useful data to several USOE programs, especially the Basic Educational Opportunity Grants program. The May 1974 survey, which is being carried out in cooperation with the Bureau of Census Current Population Survey, will obtain information from three subgroups of people: (a) Those who are enrolled in any form of postsecondary education, (b) those who have graduated from high school recently, but are not enrolled in any form of postsecondary education, and (c) those who are seniors in high school. Information from a national cross-section of these respondents, in conjunction with results of other studies of postsecondary education, will contribute greatly to development of broad-scale knowledge about a segment of the population with which the Newman Report is concerned.

(2) *Increased Timeliness*

In response to Newman, we described our proposed Fast Response panels, which will enable NCES to obtain data on a timely basis and to provide at least limited answers to questions which could not be foreseen far in advance. Funding has not yet been obtained for this exceedingly critical activity. However, it continues to be a high-priority element in our plans and is slated for initial implementation in our proposed FY 1975 budget.

We also cited the fact that, at the elementary-secondary level, NCES has established a cost-sharing program to improve capability (quality and timeliness of SEA's to respond to NCES survey. Extension of such a program to the postsecondary sector would undoubtedly contribute to our goal of prompt and responsive dissemination, as sought by Newman.

We acknowledged that Newman's point about consistent tape formats was an entirely valid one. Our own efforts, as we indicated, had been thwarted by what might best be described as a bureaucratic separation of functions. No solution was at hand at the time of the Newman Report, but a breakthrough now seems imminent. In particular, we are about to award the first in a series of contracts that will culminate in conversion of our extant data tapes to a standard format, with complete user documentation. Further, as part of the same series of efforts, we shall develop standards for production of tapes in future NCES projects, and for making tapes available, with appropriate cautions, before all data are in final edited form.

With respect to reference services, we pointed out to Newman that our present reference service *is* a genuine prototype of what is needed, but we reiterated a major need for staff and funds to access computerized data bases and to give full service to a wider range of the requests received. In the recent past, we have made real progress toward "full service" through our Educational Statistics Information Access System (EDSTAT). This system, now available to program managers and decision makers throughout the education community, is an online, user interactive (through the use of a computer terminal) large scale information retrieval system. The conceptual design for such a system was well underway at NCES, when the data base developed by the National Commission for Financing Postsecondary Education was turned over to us in January 1974. Since its acquisition, NCES has expanded the online data base and extensively evaluated its capabilities, with particular emphasis on EDSTAT's ability to provide meaningful information to educational decision or policy makers.

A major contract will be awarded in June 1974 for the comprehensive design and development of the EDSTAT system. An integral part of this plan is the assessment of user needs, a point which was made emphatically in a number of contexts in the Newman report. As we stressed in our reply, an attitude of responsiveness to user needs exists in full measure in NCES, but authority to respond is constrained by resource limitations.

(3) *Increased Policy Relevance and Analysis*

In our response, we attempted to set forth our efforts at identifying trends which may be of significance to policy makers. For example, we cited NCES' initiation in 1970 of a special internal publication medium designed to give information to the Commissioner and his staff on new findings having potential policy relevance, the *Management Bulletins.* These have presented data on a number of timely issues, including Teacher Survey and Demand, Enrollment in Environmental Health Courses, Characteristics of Vocational Education Teachers and Students, the American Indian in School, Intrastate and Interstate Disparities in Current Expenditures Per Pupil, and, most recently, Immediate Education Plans of High School Seniors, as reported in the Longitudinal Study.

We also emphasized the responsibility for policy-makers to specify their data needs to NCES and to involve NCES in their problems and deliberations. However, neither then nor now have we waited passively for policy makers to take the initiative in sharing their concerns with us. In our HEGIS program, (an example which we cited in our response) we have regularly held conferences on user requirements; in addition, we have sought input from FICE, which represents 22 Federal agencies, and from all sectors of USOE. Similarly, our development of the Longitudinal Study has, from the start, been guided by formal planning conferences and informal consultations throughout USOE. More recently, we have set up Task Forces to guide us in the development of the postsecondary CCD.

The need for a sustained, high-caliber analytic effort was underscored in CCD planning papers early in 1971, which we forwarded as part of our response to the Newman Report. As we pointed out, the proposed analysis staff has not been established because slots have not been available; we continue to include this in our budget requests. We also continue to try to move ahead on analysis through contracts or other means. Further, we try to contribute to analytic efforts that we cannot ourselves carry out. Thus, we attempt to identify data specifically needed by policy makers which their own staff may be called upon to analyze; we also try to organize data sets or combinations of sets into forms likely to contribute to policy analysis. Our response to the Newman Report pointed out an excellent example of the way in which NCES contributed by organizing and relating available data: development of computerized files of social and economic data collected in the United States Census, organized by school district, for widespread use by Federal, State and local education authorities. Subsequent to the Newman Report, financial data from the Elementary and Secondary General Information Survey were matched with the population characteristics by school district.

In summary, we concurred with Newman's emphasis on the need for analysis capability. We reluctantly agreed that resource constraints have severely limited progress toward our goals. Nonetheless, we have made some real contributions to policy-making, which the Newman Report did not acknowledge. However, the amount of time and talent required for policy analyses on major educational issues should not be under-estimated—witness the difficulties of the Commission on Financing Postsecondary Education in developing cost analysis procedures in a year's work on the part of a dedicated and highly able staff.

Mr. Bell. Describe for the record what the common core of data is and its functions.

[The information referred to follows:]

DESCRIPTION OF COMMON CORE OF DATA AND ITS FUNCTIONS

The Common Core of Data Program (CCD) is a new initiative, with the first phase beginning in FY 1974 to replace the current uneven and largely inadequate provision for educational statistics in the 50 States, 6 outlying areas, and the District of Columbia, by developing an integrated and interlocking system of educational statistics to meet Federal, State, local and institutional needs for planning and management. The first phase of the Common Core of Data Program provides for the accomplishment of several activities in support of two major strategies:

1. To provide building blocks for the long-term Common Core Program development and implementation, and
2. To deliver near-term products which are responsive to statistical data needs at the Federal level.

The first phase of the program encompasses five components planned to meet needs at the Federal level:

1. Federal Cores of Data (the sets of data items which are needed by the Federal government on a recurring basis) about Elementary-Secondary and Postsecondary Education.
2. An Educational Data Base (EDSTAT) accessible by remote computer terminals.
3. Improved analysis capability.
4. Fast Response Surveys.
5. Surveys of Educational Target Groups, the first survey to be in the 17–25 year old population; the second survey to be in the 5–17 year old population.

In later phases of this program the Federal government will play a leadership role in stimulating development of an integrated information system designed to provide data concerning the formal educational system—elementary-secondary schools and postsecondary institutions—and the informal education system, including libraries, museums, educational broadcasting, and other mass media. This program will provide eventually for the full complement of data and data services needed for effective management of the American education system. The framework for State data collection, compatibility among States, and analysis and reference service, to be developed under CCD, will be an important asset to State management of resources.

Mr. Ottina. It's in our 1975 budget. We have testified before the House Appropriations Committee about $1.3 million to launch the program. Of course, the House has not acted yet.

Mr. Bell. In dealing with a revision of title I on H.R. 69 we were faced with many problems regarding AFDC statistics. What relationships and procedures exist to facilitate cooperation between agencies on this data?

Mrs. Gilford. In order to get the data used in title I formulas, Social and Rehabilitation Service statistics staff have to collect the data from the States. They will do it on request.

Mr. Bell. What are the steps being taken to advance the steps taken on data dissemination?

Mrs. Gilford. There are several activities we have undertaken in that connection. One is the implementation of the time-shared computer system now in operation, and as Dr. Ottina has mentioned, we are putting partially edited data in that system. So it's available at four stages of editing.

Mr. Ottina. Counting from your dates, information is available 6 months from our as-of date.

Mrs. GILFORD. We also have a bulletins where we made an early release of selected data and we have put out early releases of higher education data. This is a release on opening fall enrollment for fall 1973 which was published in December 1973.

We will release preliminary higher education finance data for fiscal year 1972-73 this month and we do similar releases on other subjects rather than waiting until the material has been fully edited.

Mr. BELL. What steps is OE taking to make its data available to decisionmakers at the State level?

Mrs. GILFORD. The terminal access system, EDSTAT is available now. At the present time it does not have all our data in it, but over the next year we will move to put all our data in it, which will mean any State officer who has access to a terminal will have immediate access to our data.

Mr. OTTINA. Through the process of the development of this system each State will know the information we have gathered and therefore the information they could tap from our resources.

Mr. BELL. Those are all the questions I have.

I want to make one comment, however, Commissioner Ottina. It seems to me that the coordination between OE and the various State departments is an important aspect of our educational system.

I believe, without trying to pre-judge the civil rights issue in Los Angeles, that such a situation as existed in Los Angeles requires coordination from the Department of Education so that the matter is administered fairly.

I felt Los Angeles was hurt by the decision that went against them, although I think it has been corrected now.

Mr. OTTINA. If we are thinking about the same example, they have not yet received funds because there is a court suit against. It was a waiver of requirement which the Secretary established and that waiver was questioned by a number of districts in Michigan, as I recall, a suit was filed and is pending now before a Federal court.

There are six States, I believe, involved, California, Michigan, New York I am not sure of the others.

Mr. BELL. Is there anything that can be done to avoid that sort of thing by a little closer relationship between OE and the State departments?

Apparently there was some misunderstanding which is why we had the suit.

Mr. OTTINA. There was some misunderstanding and we should all work for closer relationship.

Mr. BELL. Mr. Quie?

Mr. QUIE. Mr. Ottina I was looking at the book here, which you submitted.

The thing that amazed me, as I look down and see the publication, is a handbook 1964. Are we going to have anything in this decade which would be relevant?

Mrs. GILFORD. That is one of the projects we have planned for next year. We have eight of these manuals, and we try to update one or two of them each year. We are revising at least one each year.

Mr. OTTINA. This is not a data collection document.

This terminology is what is used when we try to ask for information as to certain topics. This is a definitional handbook.

Mrs. GILFORD. Although it's not a very glamorous activity, it's one of the most important because these handbooks form the basis for the record system in all the school systems in the country.

Mr. QUIE. Do you have some information to determine the achievement of students in relation to the inputs in education, or, as this talks about, the circumstances under which people live?

Mrs. GILFORD. We collect some information of this type. For example, the National Assessment of Educational Progress has achievement data. It also has information as to the degree of urbanization in which the school is housed and the educational attainment of the parent. The handbooks give us a potential for collecting such information in a comparable way from the schools.

Mr. OTTINA. It's funded out of the center and, as I stated to Mr. Bell earlier, in terms of the appropriations request, it is the responsibility of NCES for that project which has been running $6 or $7 million.

Mr. QUIE. You have to write to ECS in order to get the book distributed?

Mrs. GILFORD. Yes, or to the Government Printing Office which handles general distribution of the NAEP reports.

Mr. QUIE. How about your anchor tests for reading? I see we can secure a publication which gives a description of anchor tests, but when are we going to get some results from the anchor tests?

Mrs. GILFORD. We distributed informal copies of the equivalency tables to the State school officers in January, so they have been able to use them in State evaluations; we expect we will have the publication ready to send to GPO next month, and it should be ready in the next 3 months.

Mr. QUIE. When will we be able to see that?

Mr. OTTINA. We will be happy to send you a copy.

Mr. QUIE. Let me ask you about contracting for statistics gathering. To what extent do you contract outside the center?

Mrs. GILFORD. Almost all the survey processing is done on a contract basis. Where we collect State data and simply have 50 responses, we do the tabulation in the center, but the balance of the work is done on contract.

Mr. QUIE. Do you have figures?

Mrs. GILFORD. All of the appropriations, program appropriations, are used in contracts or grants, our salary and expenses budget is running about $4.7 million now.

Mr. OTTINA. In answer to your question, if we took for 1974, our salaries and expenses $4.8 million our program dollars $8.75 million, so roughly one-third, two-thirds.

Mr. QUIE. You made a statement in your testimony that you don't like the Senate's provision for a seperate national center because it would then no longer be possible for the capabilities developed in the national center to be utilized by the Office of Education.

I believe you expressed this was beneficial to you in doing your planning for budget, the operation of your department, the evaluation, and so forth.

If that is the case, it seems you are contracting out a great deal of the activity which is seperate and therefore not beneficial to you because the contractor develops a staff which knows how to write proposals and all that.

I always like to see research conducted in higher education because there is a byproduct produced by that as well. To the extent of your developing evaluations within your department, you then develop a staff capability for handling the program.

Mr. OTTINA. It would be much better to have an in-house staff. We are settling for something clearly second-best. The person running the contract is knowledgeable, but not to the degree he or she would be if there were direct involvement.

Mr. QUIE. You indicated it would be more desirable if it was a matter in-house. Why don't you do it?

Mr. OTTINA. We have not had the resources in-house to do it. As a matter of fact, as Mrs. Gilford and I have mentioned earlier——

Mr. BELL. Is that money or staff?

Mr. OTTINA. In the direction Mr. Quie is asking the questions, that is staff.

Mr. QUIE. It takes money to hire staff.

Mr. OTTINA. That is correct.

Generally speaking, our greatest problems in terms of trained resources have been problems of salaries and expenses appropriations. During the last 3 years there have been intensive efforts to keep the staff at a minimum level, those programs have made it difficult to justify large increases in the staff required to have an in-house effort.

As I have commented earlier, we have added personnel to the staff. This is an environment in which Federal staffs are being decreased and it has been very, very difficult. We have gone through a series of reductions, freezes, and many things have made it very hard.

Mr. QUIE. The Office of Education was established as a statistics-gathering agency, and it seems to me they have fallen away from the original concept.

Project Baseline is an ongoing statistics-gathering program funded through the National Advisory Council on Vocational Education. To what extent does the National Center for Educational Statistics take Project Baseline information and feed it into your work?

Mr. OTTINA. Mrs. Gilford estimated what percentage of the information was gathered from our sources.

Mrs. GILFORD. Most of the baseline data comes from the reports sent to the Bureau of Vocational Education. This has been displayed in many ways in Baseline reports. Baseline has used the programing reports which goes to the Director of Vocational Educational Programs, and in addition has selected data from some States beyond that. Baseline also contains some data from the Census Bureau and the MDTA Program of the Labor Department.

Mr. QUIE. To what extent?

Mrs. GILFORD. The Bureau has used the program reports for years in managing vocational education programs.

Mr. QUIE. These are the program reports that come to OE?

Mrs. GILFORD. That is correct.

Mr. QUIE. Anything you do out of vocational education you get that information for statistics-gathering from NCES, as well, don't you?

Mrs GILFORD. NCES does not collect the State reports on OE vocational education program. We have run separate surveys of vocational education, and we have published directories of vocational education institutions. We are planning to put some of the State report data on vocational education in the computer system so it will be available for analytic studies.

Mr. OTTINA. We would attempt to absorb that in our ongoing system, especially our tape system, so it could be more readily accessible.

Mr. QUIE. Back to Project Baseline, am I correct in assuming nobody in the Office of Education is using that?

Mr. OTTINA. I don't believe that is a correct statement.

Mr. QUIE. Could you find out for us?

Mr. OTTINA. I have seen the report, I have gone through it. I know we have talked about certain aspects of it in the past. Mrs. Gilford has been consulted on several occasions. So I know your statement isn't correct, that nobody is using it.

Mr. QUIE. If you would, please furnish for the record, because I am familiar with Project Baseline.

Mr. OTTINA. We will.

[Following information submitted for the record.]

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE,
OFFICE OF EDUCATION,
May 28, 1974.

Memorandum To: Dr. Al Alford, Assistant Commissioner for Legislation.
From: Director of Planning, Bureau of Occupational and Adult Education.
Subject: Information Regarding the Use of Baseline Data

My comments relate principally to the two Project Baseline reports. The first is dated November 1972; the second November 1973. I am also attaching a copy of a letter Dr. Pierce sent to Dr. Lee on April 19, 1974 listing the U.S. Office of Education's data requirements for vocational and technical education.

Most of these data requirements are met through annual reports supplied by State agencies. Such reports provide information primarily on the *input* side of educational activity. This includes number of schools, enrollments, expenditures, number and types of professional personnel. What is not provided in sufficient detail is program *impact* and *outcome* data. Information on geographic accessibility to programs is also limited. The Office of Education's data supply is more adequately meeting the input side of our data needs. The Baseline reports largely supplement our existent data with the same type of input information. The project staff returned to the source of our information, in other words the State education agencies, rather than depend solely on our files. The reports include additional analyses and recommendations.

When combining the data produced by the National Center for Educational Statistics in their studies on student and teacher characteristics in vocational education, the products of the National Longitudinal Survey of High School Graduates of 1972, the several other evaluation studies conducted by the Office of Program Planning and Budgeting, the annual reports of State agencies for vocational education compiled and published by BOAE, the evaluation reports of the State advisory councils on vocational education, and the reports of the National Advisory Council on Vocational Education, the information produced by Project Baseline duplicates much available information.

The Bureau of Occupational and Adult Education does not have plans for dissemination of these reports other than as required in the contract.

LEROY A. CORNELSEN.

Attachments:

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE,
OFFICE OF EDUCATION,
Washington, D.C., April 19, 1974.

Dr. ARTHUR M. LEE,
Director,
Project Baseline,
Northern Arizona University,
Flagstaff, Ariz.

DEAR DR. LEE: The U.S. Office of Education data requirements for vocational and technical education are currently encompassed by the items noted in the enclosed listing. The degree of information available for the items specified varies widely. Some is provided to us on a regular basis, some available only from secondary sources, and still others not available at this time.

This attached information is provided solely for your use in carrying out responsibilities included in current scope of work specifications contained in the OE contract with Northern Arizona University.

If you need assistance in interpreting items listed, please feel free to contact us.

Sincerely,

WILLIAM F. PIERCE,
Deputy Commissioner for Occupational and Adult Education.

Enclosure:

U.S. OFFICE OF EDUCATION—DATA REQUIREMENTS FOR VOCATIONAL-AND TECHNICAL EDUCATION

(1) *Expenditures* for planning, developing, installing, operating and evaluating vocational education programs: Source of funds.

(2) *Persons served:* Number, characteristics, place of residence (urban, suburban, exurban, rural).

(3) *Types of programs and services* provided according to each purpose in the legislation: Expenditure data; cost effectiveness; participant information.

(4) *Occupations for which instruction is provided* and number of completions and placements.

(5) *Program impact* and outcome data: Effectiveness data; graduate success and follow-up information; employer satisfaction with employed graduates; graduate experience and success in further education; graduate trend data for additional education and job mobility; program responsiveness to labor market needs and trends; research and curriculum products resulting from State financial efforts.

(6) *Geographic accessibility* to programs: Rural residents; central city residents; suburban and exurban residents.

(7) *Types of institutions*, agencies providing vocational education: Public; non-public/private; military; business and industry.

(8) *Professional personnel:* vocational education: Administrators; Teachers; Counselors; Placement officers; researchers; Planners; evaluators.

(9) *Nature and extent of youth group activities.*

(10) *Nature, extent and availability of comprehensive career guidance and counseling services.*

Mr. QUIE. As you know, I have been unhappy since we started out with the assumption that poor children were educationally disadvantaged and therefore, we should discontinue our formula for distribution of funds under title I.

What studies are going on right now in trying to get better information as to who is educationally disadvantaged?

Mr. OTTINA. I am aware of an NIE study, Mr. Quie. That is the only one with which I am familiar at this time.

Mr. Quie. We get information such as: here are the poor children; here are their names; these are educationally disadvantaged. I was wondering if anybody has gotten into that.

It seems to me there is a very limited extent to which that type of study has been undertaken.

Mrs. Gilford. I am not aware of such a study.

Mr. Quie. The NCS is not doing a study on that and OE is not doing a study on that, and you don't want us to mandate statistical studies in legislation

Mrs Gilford. The 5-year plan for CCD provides for such a study. At present it is beyond our resources. It's a very large study.

Mr. Quie. I know it's a large study. I would just like to find out about it. I hope some day we will have it.

Mr. Bell. Mr. Commissioner, it seems to me that through all of this discussion there runs a problem that I would like to put my finger on relative to the repository situation.

You have your statistics over here, you have statistics on impact data, and it seems to me some serious thought ought to be given to a central statistical area in which you pool everything. Does that make any sense, or, if not, why not?

Mr. Ottina. The condition I was trying to describe, Mr. Bell, is really a situation where the program managers have at their disposal information, program information: how many children it has, what their rate of payment is, et cetera. When you talk about impacted aid, however, that type of information is not usually of tremendous interest.

It's those pragmatic statistics, if you would like to call them that which are really more important to program managers than general education statistics. Let me stop there. They are statistics primarily in the hands which operate them because they need them on a day-to-day basis to honor claims and so forth.

There is no way a program can operate without that information. Clearly it could be duplicated in another central repository.

Mr. Bell. Thank you very much.

Mr. Steiger, any questions?

Mr. Steiger. No. I want only to make sure the record would indicate the distinguished gentleman from California, after 10 years, has finally reached the Chair.

Mr. Bell. I also mentioned to the minority ranking member that the reason I took so long with my questions is because I am Chairman.

Mr. Steiger. Dr. Ottina, you are wrong that we have not handled the problem of mandating studies. I think we have left a couple out that perhaps we can sneak in.

Mr. Bell. Thank you very much, Mr. Cooke, Mrs. Gilford, and Dr. Ottina.

Dr. Joel Berke, director of Educational Finance and Governance Center, Syracuse University Research Corp. is our next witness.

Please come forward.

Mr. Bell. Dr. Berke, you can summarize your statement, if you would like.

STATEMENT OF JOEL S. BERKE, DIRECTOR, EDUCATIONAL FINANCE AND GOVERNANCE CENTER, SYRACUSE UNIVERSITY RESEARCH CENTER: ACCOMPANIED BY DR. ROBERT FIRESTINE, COORDINATOR OF ECONOMIC STUDIES

Dr. BERKE. Let me introduce my colleague, Dr. Robert Firestine, coordinator of economic studies at our center. He is in charge of developing a computer system for understanding the impact of finance programs.

The statement I am presenting is a joint statement on behalf of Dr. Firestine, Dr. Robert Goettel, who is not here today, and myself.

Today's hearing is very important, for without timely, relevant, and accurate information, policymakers are handicapped in assessing the problems before them, in evaluating the operation of current policies, and in developing intelligent and effective legislative responses for the future. My summary draws upon our research over the past 5 years and our experience of Federal statistics and State and local statistics as well.

The major and overriding conclusion we have come to is that, despite conscientious efforts and despite some improvement in recent years, the present system of educational information services of USOE falls short of providing the information needed to cope with the Nation's educational problems. From the policymaker's viewpoint, this failure has four critical dimensions:

1. Information is seldom organized and presented within a policy-relevant framework. There is little indication that Federal education data collection begins with the most basic of questions: data for and about what?

2. Information that is collected and disseminated is rarely analyzed. As a result, USOE information is typically presented according to the alphabetical order of the States or the enrollment size of school districts, two characteristics that usually have little relevance to the major issues facing the Nation.

3. Long delays in publication reach scandalous proportions, discouraging use of the reports by policymakers and opinion molders.

4. Numerous gaps exist in the availability of data required to answer policy questions. Suitable comparisons from district-to-district or State-to-State are often not available on important questions like pupil achievement or educational needs in some basic instructional areas.

5. Educational data is dispersed among numerous agencies and USOE fails to bring them together.

Now this is not to suggest they should collect all the data relative to education. It is meant to suggest that someone in this town should provide an overview of the entire educational landscape, drawing more heavily upon and integrating their own work with information available from the Bureau of Census and other agencies.

Even in summary these are serious critisisms. But responsibility for them is difficult to fix. The National Center for Educational Statistics has made major efforts in the last few years to improve data collection procedures and to meet a number of the problems described above. But it operates with the same size staff in 1974 as it had in 1969: 168 employees.

For much of that period, despite increasing responsibilities, its complement was only 145. Compare this with the National Center for Health Statistics with over 500 employees, the Department of Agriculture's statistical reporting agency with over 1,000 and the Bureau of Labor Statistics with over 2,000 personnel.

Commissioners of Education who borrow staff from NCES for other worthy purposes, the Office of Management and Budget which regularly cuts HEW budget requests for the Center, Congress which has cut the administration funding requests for statistics in order to put more money into grant programs, all must shoulder portions of the blame.

What recommendations would we make? First, and most fundamentally, the basic function bestowed on USOE by its organic act more than a century ago must be given high priority.

Budget and staff must be reflective of the magnitude of public educational enterprise in the United States and of the complexity of the policy questions in the field. Delays in providing reports can most readily be shortened by having more hands to help with the work

Reports with more sophisticated and useful analytic content require experienced and highly trained professionals, and if such new activities are to come without detracting from basic data collection functions, a substantial net addition to staff capacity will be required.

All this costs money. As a starter, perhaps twice to three times what is currently spent. It also requires commitment to the importance of statistics and information by ~~the top~~ HEW and USOE management.

Secondly, we would suggest that an analytical staff located in the National Center for Educational Statistics should produce information on education which explains trends in (a) the demand for education, (b) the costs, (c) the concepts of equity in the allocation of educational services and costs, and (d) the impact, both fiscal and, to the extent possible, educational of Federal programs.

Thirdly, we would suggest that an advisory committee should be created. Composed of recognized scholars and other policy-oriented users of educational data, the committee should be charged with producing an annual report to the Congress, the Secretary of Health, Education and Welfare and the Commissioner of Education on (1) the important trends in the condition and progress of American education and (2) the state of the Office's information collection, analysis, and dissemination. Such a committee, with a staff of its own, would parallel in a general way the functions provided by such committees as the Advisory Commission on the Education of Disadvantaged Children.

Mr. QUIE. Do you think they work well, the Commission on Disadvantaged Children? Is that why you use them as an example?

Dr. BERKE. I have used some of their reports and my evaluation is that they serve a useful function, at least at certain points in history.

The fourth point is that. Federal policymakers must be able to trace State patterns because States are and will continue to be the dominant units in the Federal education partnership for the foreseeable future.

At present the data provided by USOE gives only (a) State averages, which are too gross to be meaningful for most purposes, or (b) selected school district totals usually grouped by size of district. No samples adequately representative of individual States are regularly provided.

For instance, the National Center, happily, switched to a sample of districts for the census year which was large enough to provide information about States. Immediately after the census year, because of funding and staffing problems, the Center went back to a sample size inadequate to provide accurate microcosms of the States. The last 6 or 7 years, the survey has been operating, it has not provided adequate information.

Lastly, we have suggested that USOE must vastly increase its competence with and use of data relevant to educational questions collected by other agencies. I think it is clear that the Center has moved in this direction. It is very helpful to all of us to have this data available, but more could be done if an analytical staff were available to carry out those functions.

I have closed my testimony by including two excerpts from the study we conducted for the President's Commission on School Finance. Included is the final chapter with a summary and recommendations—some I have mentioned briefly; some are more detailed. Also included is a discussion on the National Center for Statistics and for those who want more detail, I would suggest the full study.

Mr. BELL. Without objection, your statement and the additional information will be placed in the record.

[The material referred to follows:]

PREPARED STATEMENT OF DR. JOEL S. BERKE, SYRACUSE UNIVERSITY RESEARCH CORPORATION, EDUCATIONAL FINANCE AND GOVERNANCE CENTER, WASHINGTON, D.C.

Mr. Chairman and members of the General Subcommittee on Education: I am Dr. Joel S. Berke, Director of the Educational Finance and Governance Center of the Syracuse University Research Corporation. The testimony I am presenting this morning is a joint statement on behalf of myself and my two senior colleagues at the Center, Dr. Robert E. Firestine, who is with me this morning, and Dr. Robert J. Goettel, who is not able to be here.

We are delighted to have your invitation to present our views on improving national educational statistics. The topic is one that many deceptively appear dull and even trivial, but as members of this subcommittee know, it is in reality one of the most critical problems facing anyone who seeks to improve the quality and the opportunity afforded by public education in the United States. *For without timely, relevant, and accurate information, policymakers are handicapped in assessing the problems before them, in evaluating the operation of current policies, and in developing intelligent and effective legislative responses for the future.* In short, the quality of the statistical information provided by the federal government on education is an important determinant of how successfuly this nation can cope with the pressing need to improve the education received by present and future generations of Americans.

The Experience of the SURC Educational Finance and Governance Center With Educational Statistics

Mr. Chairman, permit me to provide some information on the Educational Finance and Governance Center (EFGC) and on its interest in educational statistics. We are a not-for-profit organization that has been conducting studies on the financing of American public education for the last five years. In our work we often utilize data tapes and reports of the National Center for Educational Statistics of the U.S. Office of Education.

But besides the fact that we are consumers of federal educational statistics, there are three particular reasons for our interest in the field. First, the origin of the EFGC lay in a request made to Syracuse University five years ago by the Ford Foundation and the National Urban Coalition asking if we could provide better information than was currently available from USOE on the patterns of distribution of federal aid to education. The fruits of that research, a book titled *Federal Aid to Education: Who Benefit? Who Governs?* is well known to this Committee and was cited most recently in the Committee Report accompanying H.R. 69, the Elementary and Secondary Education Amendments of 1974. In the course of conducting that work, my colleagues and I became impressed with the need for change in th orientation and the content of some of the federal information available on education.

Second, about a year after we had completed that research, the President's Commission on School Finance asked if we would be willing to undertake a systematic review of information available for educational policymaking at the federal level, and in the course of that study we had the opportunity to extend and refine our understanding of the field. The report on that project, *Improving Information Systems for Educational Policymaking*, (a report of the President's Commission on School Finance) will be drawn upon in our testimony today.

And third, in the spring of 1972, the Educational Finance and Governance Center received funding from the Department of Health, Education, and Welfare to provide continuing analysis for the federal government of developments in the field of educational finance. A central component of our task is to provide a computer-based capacity for simulating the effects of changes in federal and state educational policy to assist in understanding current developments and in developing potential federal responses. In the course of that work, we have utilized a combined data set of U.S. Office of Education and U.S. Bureau of the Census statistics.

In short, Mr. Chairman, from the origin of our program, through our study of information available for policy analysis, and through our current research for the Department of Health, Education, and Welfare we have become interested, involved, and knowledgeable about the quality of education statistics provided by the U.S. Office of Education. And as a result of our experience we have developed a view on the problems and needed improvements in federal educational statistics that we are happy to share with you today.

An Overview of the Problem

The major and overriding conclusion we have come to is that *despite conscientious efforts and despite some improvement in recent years, the present system of educational information services of USOE falls short of providing the timely, reliable, and relevant information needed to cope with the nation's educational problems.* From the policymaker's viewpoint, this failure has four critical dimensions:

1. Information is seldom organized and presented within a policy-relevant framework. There is little indication that Federal education data collection begins with the most basic of questions: *data for and about what?*

2. *Information that is collected and disseminated is rarely analyzed.* As a result, USOE information typically is presented according to the alphabetical order of the states or the enrollment size of school districts, two characteristics that usually have little relevance to the major issues facing the nation.

3. *Long delays in publication reach scandalous proportions,* discouraging use of the reports by policy-makers and opinion molders.

4. *Numerous gaps exist in the availability of data required to answer policy questions.* Suitable comparisons from district-to-district or state-to-state are often not available on important questions like pupil achievement or educational needs in some basic instructional areas.

5. Educational data is dispersed among numerous agencies and the USOE fails to bring them together. Among the federal agencies that currently collect, aggregate, and maintain information of significance to educational policy formulation are the United States Office of Education, other agencies

of HEW, the Office of Economic Opportunity, the Departments of Labor and Commerce, the Advisory Commission on Intergovernmental Relations, the Census Bureau, the Office of Management and Budget, and the Library of Congress. State educational agencies and regional associations are additional sources of information, as are private organizations like the National Education and the National Catholic Education Association. The fact that multiple reporting and analytic centers exist is not itself a problem, although examples of inappropriate assignments by OMB could be cited. *The real problem is that USOE has not effectively undertaken the task of providing an overview of the entire educational landscape.*

Even in summary these are serious criticisms. But responsibility for them is difficult to fix. The National Center for Educational Statistics has made major efforts in the last few years to improve data collection procedures and to meet a number of the problems described above. But it operates with the same size staff in 1974 as it had in 1969, 168 employees. For much of that period, despite increasing responsibilities, its complement was only 145, this in comparison with the National Center for Health Statistics with over 500 employees, the Department of Agriculture's statistical reporting agency with over 1,000 and the Bureau of Labor Statistics with over 2,000 personnel. Commissioners of Education who borrow staff from NCES for other worthy purposes, the Office of Management and Budget which regularly cuts HEW budget requests for the Center, Congress which has cut the Administration funding requests for statistics in order to put more money into grant programs, all these must shoulder portions of the blame.

Overview of Recommendations

1. What recommendations would we make? First, and most fundamentally, *the basic function bestowed on USOE by its organic Act more than a century ago must be given high priority.*

> Section 1.—There shall be established, at the city of Washington, a Department of Education, for the purpose of *collecting such statistics and facts as shall show the condition and progress of education in the several states and territories, and of diffusing such information* respecting the organization and management of schools and school systems, and methods of teaching, as shall aid the people of the United States in the establishment and maintenance of efficient school systems, and otherwise promote the cause of education throughout the country.

Budget and staff must be reflective of the magnitude of the pubic educational enterprise in the United States and with the complexity of the policy questions in the field. Delays in providing reports can most readily be shortened by having more hands to help with the work. More sophisticated and useful analytic content to reports requires experienced and highly trained professionals, and if such new activities are to come without detracting from basic data collection functions, a substantial net addition to staff capacity will be required. All this costs money, perhaps twice to three times what is currently spent as a starter, and it requires commitment by top management in HEW and USOE that statistics and information are important.

2. But more money and people alone will not provide the radical changes necessary to cure the problems described above. *Information on education which explains trends in (a) the demand for education, (b) its costs, (c) conceptions of equify in the allocation of educational services and costs, and (d) the impact, both fiscal and, to the extent possible, educational of federal programs should be produced by an analytical staff located in the National Center for Educational Statistics.* The function of the staff would parallel the activities of such agencies as the Bureau of Labor Statistics and the Office of Business Economics. While the Center has made important progress in upgrading its statistical competence in the last few years, more adequate analysis will require the addition of personnel trained in demography, economics, education, public finance, sociology and other areas of social science expertise.

The thought, it must be stressed, is not that NCES should undertake sophisticated research. The idea is that it should provide a series of indicators by aid of which we as a nation could chart our progress in instruction, in learning, in financial support, in the equity of revenue raising and resource distribution, in short, "such statistics and facts as shall show the condition and progress of education."

3. *To guide improvement in NCES information gathering, analysis and dissemination, an advisory committee should be created.* Composed of recognized scholars and other policy-oriented users of educational data, the committee should be charged with producing an annual report to the Congress, the Secretary of Health, Education and Welfare and to the Commissioner of Education on (1) the important trends in the condition and progress of American education and (2) the state of the Office's information collection, analysis, and dissemination. Such a committee, with a staff of its own, would parallel in a general way the functions provided by such committees as the Advisory Commission on the Education of Disadvantaged Children. It would serve to ask the immensely important question: "Information for what?" Ambitious organizational changed like those envisioned in the Common Core of Data for the Seventies, will serve as useful function only as a body of analytically and policy-oriented people influence the selection of items to be collected and the manner in which they are organized and presented.

4. Because states will continue to be the dominant units in the federal education partnership for the foreseeable future, federal policy-makers must be able to trace state patterns. At present the data provided by USOE gives only (a) state averages, which are too gross to be meaningful for most purposes, or (b) selected school district totals usually grouped by size of district. No samples adequately representative of individual state are regularly provided. In order to formulate and monitor more flexible federal policies that are responsive to state diversity, *statistical series like the Elementary and Secondary General Information Survey should be expanded and revised an annual source of reliable information on the operation of public districts in their state context.* In fact, consideration might be given to a decennial census of date on *all* districts in all state to give base year data for charting future trends or making projections.

5. *USOE must vastly increase its competence with and use of data relevant to educational question that are collected by other agencies.* Municipal data that have relevance for the fiscal capacity and overall tax effort of school districts collected by Census of Governments, and the Office of Revenue Sharing in the Treasury Department; demographic data that provides descriptions of pupil population that are important in policy formulation is collected by the Census of Bureau Governments; social service data collected by the welfare administration in the Department of Health, Education, and Welfare; and labor market data relevant to job opportunities and job training collected by Labor and Commerce should all be regularly integrated with educational data by analysts who might work in an ideal National Center for Educational Statistics of the future.

Mr. Chairman, as I think you know, public officials of branches of government, educational researchers and commentators, and citizens with an interest in American public education are not well served by our current federal data reporting services. Information is incomplete, slow to become available, widely dispersed, and often irrelevant to the central question on the nation's educational agenda.

That this is so should not surprise us. Certainaly, providing the largest area of domestic governmental activity with the smallest statistical center by far and then saddling it with extraneous functions like making aid allocations is a sure recipe for disaster. One study after another has found the same problems and reached roughly the same conclusions about the directions of needed change.

Our testimony today has been designed to provide an overview of those problems and recommendations, and as appendixes to this testimony we are including two sections from our report to the President's Commission on School Finance, *Improving Information Systems for Educational Policy-making.* For those who seek still greater detail we recommend the report in its entirety and the studies cited therein.

But when all is said and done, the major need is not for carefully detailed recommendations or ambitious administrative reorganization, although both may be necessary. The critical need is for commitment, commitment to the notion that improved policies for American public schools must be undergirded by systematic study and analysis. And in enterprises as vast as education, systematic analysis requirestimely, reliable, and policy-relevant statistics

Such statistics will be developed only when Directors of the Office of Management and Budget, Secretaries of Health, Education, and Welfare, Assistant Secretaries for Education, and U.S. Commissioners of Education place reporting on the "condition and progress of education" high on their agenda ofresponsibilities. The informed concern of this sub-committee will encourage and stimulate such a commitment. We are delighted that you have signalled the intention of the Congress to concern itself with this important area and we are honored that you have invited us to present our views today.

Dr. Firestine and I will be happy to respond to any questions you may have.

IMPROVING INFORMATION SYSTEMS FOR EDUCATION POLICYMAKING

(By Robert J. Goettel and Joel S. Berke)

Appendix A

SUMMARY AND RECOMMENDATIONS

The previous five chapters of this report have been addressed to identifying the problems of providing useful information for those who formulate and evaluate educational policy, particularly education finance policy, at the national level. The system of collecting, analyzing and disseminating data has been examined with particular emphasis on the most glaring shortcomings and anomalies in that system. We have examined and catalogued both the availability and the usefulness of information on the important questions on the nation's educational agenda through interviews, questionnaires, and staff analysis. We have met with local, state, and national officials of both executive and legislative branches, and have studied reports of previous panels which have looked into the information gap in elementary, secondary and higher education. As a means of judging the usefulness and organization of educational data, we developed a framework for policy analysis.

Summary

On the basis of those research activities, our major conclusion is that the present system of educational information fails to serve the requirements of those who need timely, reliable and relevant information about the nation's educational problems. From the policymakers viewpoint, this failure has four critical dimensions:

1. Information is not organized and presented within a policy-relevant framework. There is little indication that federal education data collection begins with the most basic of questions: *data for and about what?*

2. Information that is collected and disseminated is rarely analyzed. As a result, USOE information typically is presented according to the alphabetical order of the states or the enrollment of school districts, two characteristics which usually have little relevance to the major issues facing the nation.

3. The format and presentation of the information as well as long delays in publication discourage use by policy-makers.

4. Numerous gaps exist in the availability of data required to answer questions relative to the education agenda in the 1970's. Such gaps occur for three reasons.

   a. Suitable comparisons from district to district or state to state are often not available in any form. Examples include pupil achievement data, cost benefit data, and "needs" data in basic instructional areas.

   b. Data available for some aggregations of school districts, municipalities and states are not available for other aggregations or levels. This is one of the principal reasons why it is so difficult to relate fiscal data about education to data about other state and municipal services.

   c. To be useful to policy-makers an item of information must be presented in relationship to another item to create an index which permits analysis and conclusions. As often as not, USOE publications present raw data which are of little use to policymakers.

One of the more discouraging findings of this study is that many of the problems that we have identified and the recommendations that we are making have been noted by numerous individuals and study committees over the past 30 to 40 years. Those problems continue to exist. In light of the increasing operational role of the Federal government in education and the current crescendo of voices calling for a vast increase in the Federal share of total revenues for education in the 1970's, the need for solutions to data problems has become critical.

The primary reason why significant information gaps continue to exist while substantial recommendations have largely been ignored is that both the executive branch of the government—beginning with the USOE—and the majority of Federal legislators have in the past not considered the need for good information about education sufficiently pressing to insist that changes be made. Specifically, executives and legislators have failed to exert the aggressive leadership required to overcome bureaucratic lethargy and shortsightedness, and to provide the substantial increase in funds necessary to get the same kind of job done in education that is routinely expected of business and labor, agriculture, health, and a host of other Federal statistical programs. Without such leadership from the White House, the Secretary of Health, Education and Welfare, the Commissioner of Education, key Senators and Congressmen, and without sufficient fiscal and staff resources, there is little likelihood that our recommendations will fare any better than those of earlier studies. Put another way, the notion that the USOE should do a thorough and systematic job of analyzing and reporting the condition and progress of American education is not just an idea whose time has come. After more than 100 years of an Office of Education, it is, we believe, long overdue.

Our recommendations have two foci. First, we discuss a series of recommendations addressed to the information system for education as a whole, recommendations designed to generate and institutionalize fundamental change in the process of collecting, analyzing and disseminating information. Second, we present recommendations dealing with each of the components of the system by focusing on the collection, analysis, and reporting functions independently.

We must note our recognition that these recommendations are not made to or about a static information system. Rather, the present activities of the USOE, including the publicly expressed intentions of the Commissioner, indicate considerably more drive towards development of a dynamic information program than at perhaps any previous time in the history of the Office.[1] Some of the problems we have discussed have also been identified by responsible officials within the Office. Similarly, some of our recommendations are under internal consideration. Nevertheless, there are areas in which substantial differences exist between our recommendation and present USOE plans. These result from our overriding concern with the needs of the policy process and our primary emphasis on serving the information requirements of policy-makers in the executive and legislative branches of the Federal government, as well as citizens who must pass judgment on their actions.

RECOMMENDATIONS

We believe the following three recommendations are the most critical that emerge from our research:

1. Data Analysis

Data about American education must be analyzed.—A series of publications which explain spatial trends in (1) the demand for education, (2) its costs, (3) conceptions of equity in regard to educational services and costs, and (4) the impact, both fiscal and, to the extent possible, educational of Federal programs should be produced by an analytical staff located in the National Center for Educational Statistics of the United States Office of Education. The function of the staff would parallel the activities of such agencies as the Bureau of Labor Statistics and the Office of Business Economics. More specific recommendations will be discussed below under analysis.

2. Advisory Committee

To guide improvement in NCES information gathering, analysis and dissemination, an advisory committee should be created.—Composed of recognized scholars and other policy-oriented users of educational data, the committee should be charged with producing an annual report to the Congress, Secretary of Health, Education and Welfare and to the Commissioner of Education on (1) the important trends in the condition and progress of American education and (2) the state of the Office's information collection, analysis, and dissemination. Such a committee, with a staff of its own, would parallel in a general way the functions provided by such committees as the Advisory Commission on the Education of Disadvantaged Children. Specifically, it would provide the immensely useful function in regard to data services of asking the essential question: "Information for what?" Ambitious organizational changes like those envisioned in the Common Core of Data for the Seventies will serve a useful function only as a body of analytically and policy-oriented people influence the selection of items to be collected and the manner in which they are organized and presented.

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[1] See "Data Gathering—a Time for Planning," a speech by Commissioner of Education Sidney P. Marland, Jr. presented to the opening session at the annual Commissioner's Conference of the Council of Chief State School Officers in Washington, D.C., Thursday, June 17, 1971.

3. In-depth analysis

Ultimately, however, independent, continuing, in-depth analysis of the state of American education and educational finance will come only from a body roughly comparable to the National Bureau of Economic Research.—Funded, perhaps, by the National Institute of Education and the States, such a body could develop the prestige and competence to attract distinguished senior scholars and the most able junior colleagues. Drawing upon the data of NCES, private interest groups, and university based research; cutting across jurisdictional levels both horizontally among the agencies of the National Government and vertically among State Education Agencies and Local Education Agencies, such an agency is the primary hope we have for the development of the all important capacity to provide critical analysis and evaluations of the information collected about the condition and progress of American education.

ADDITIONAL RECOMMENDATIONS

Having considered ways in which the Federal government can provide a framework and mechanism for reassessing information needs for policy formulation, we turn now to recommendations that focus on the procedures for fulfilling those needs. The following three sets of recommendations are designed to improve the collection, analysis and dissemination functions of the USOE. Specific attention is given to relationships between USOE and other agencies of the Federal government as well as between USOE and state and local education agencies.

4. Data collection

The thoroughness and effectiveness with which data are collected are two of the most critical elements in the process of developing a comprehensive information system. In recent years NCES has generally demonstrated the ability to effectively manage the data collection process for those areas in which it has responsibility. But as we have noted on several occasions in this Report, additional data pertinent to educational policy are collected by program management bureaus of USOE and not currently controlable by NCES and by agencies of the Federal government other than the Office. One of the needs, therefore, is to bring data collected by other agencies to the NCES in a format that permits analysis with general purpose education data. Similarly, data collection procedures directed at state and local school districts can be improved in order to enhance the reliability of data and to reduce the burden upon those agencies. The recommendations in this section focus on USOE activities, relationships with other Federal agencies and relationships with states and local school districts.

4.1. Office of Education Activities: These recommendations are addressed to the integration of general purpose data and program management data, shifting of the responsibility and reassessment of the Belmont Project, and development of a new "state specialist" approach to data collection.

4.1.1. *General purpose data—those data which are currently collected by the NCES to inform the nation about the "condition and progress of American Education"—and data required for program management purposes—those data which are often required by legislation for monitoring Federal aid programs—should be integrated.* As we noted in Chapter IV, more than 90 percent of all data submitted to USOE by states and local school districts go to bureaus *other than* NCES. While such data are undoubtedly important to the administration of programs, they may well serve as a rich source of information in addition to being an immense burden on states. The story of the Title I Compliance Survey reported in Chapter IV is probably only the most broad based and potentially useful of a number of similar situations. The point is, we have no idea—and we suspect that neither do NCES staff nor top management at USOE—what program management data are collected and (1) the extent to which those data might be useful in providing answers to some of the important policy questions and (2) the extent of the duplication that exists among the data activities of program bureaus. NCES staff are attempting to get a handle on this problem, but they clearly need the support of top level USOE management. The following four sub-recommendations will help in that effort.

a. *NCES should develop an inventory of data requests, forms, reports, individual data items, samples and USOE users.*

b. *All surveys for data to states (and local districts) form USOE should be approved by NCES.*

c. *Where necessary, legislation should be amended to facilitate coordination and to reduce duplication in the internal USOE data program.*

d. Appropriate staff positions should be allocated to NCES to accomplish tasks a and b.

4.1.2. *Consistent with 4.1.1, the Belmost Project (Consolidated Program Information Report, Elementary School Survey, Secondary School Survey) which was designed to collect program evaluation information should be assigned to NCES. NCES staff should conduct a thorough review of all components of Belmont to assess the extent to which the entire project can, with modifications, serve policy information needs.* Belmont was developed in the Bureau of Elementary and Secondary Education and then transferred to the Office of the Deputy Commissioner for Development. Recently there has been indication that NCES would be assigned direct responsibility for Belmont. Such a move is critical—it perhaps bears even more important symbolic significance—to the centralization and coordination of all USOE data activities, the internal bureaucratic politics of the Office notwithstandng.

4.1.3. *NCES should assign data collection specialists to a given number of states with responsibility for supervising the collection and integration of data about those states from state education agencies and other Federal agencies.* Such specialists would (1) become expert in the data problems of the states to which they are assigned, (2) serve as liaison persons with state education agency personnel and, (3) serve as liaison persons between NCES and USOE program management bureaus for their assigned states. Each specialist would be the most knowledgeable person in the Federal government about any data that has bearing on education in his assigned set of states. In this role he would be the person in NCES to whom state education agency data specialists could consistently turn and would be the resource person for other USOE personnel. The "specialists" designation implies positions that should have high stability over time with obvious implications for USOE personnel policies.

4.2. *Interagency cooperaton:* One of the realities of assimilating data in response to questions arising from any comprehensive education finance policy framework, including the one that we have proposed in Chapter V, is that much of the data come from sources other than USOE. Indeed, one of the major shortcomings in the NCES data program is that USOE publications rarely deal with education programs managed by or information collected by other agencies of the Federal government. When USOE is interested in obtaining data from other sources, NCES staff are largely dependent upon their ability to persuade their counterparts in other agencies of their needs for data relative to education interests. Two steps are called for:

4.3.1: *Continuing support must come from the Commissioner of Educatoin and, when necessary, from the Secrtary of Health, Education and Welfare for strengthening the links between the various agencies collecting education data.* The Office of Management and Budget can play an important role in promoting such coordination among agencies.

4.3.2: *All Federal agencies that request data from state and local education agencies should have requests approved and processed by the NCES forms* clearance operation. Such agencies would include: a. Office of Civil Rights, HEW; b. Census of Governments; c. School Lunch, Department of Agriculture.

Just as the laudable efforts of NCES to reduce the burden on states by avoiding duplication of efforts and promoting effective coordination of surveys are often hampered by practices of other USOE bureaus, the same problems are created by agencies outside of the Office. The survey mailed to state education agencies by the Office of Civil Rights, HEW, in the early fall of 1971, is a recent example. That survey clearly ignored practices that had been agreed to by NCES and state representatives to the Committee on Education Data Systems.

The states have every reason to expect better treatment from the Federal Government.

We fully recognize the pitfalls that exist in this recommendation which calls for greater bureaucratic centralization, particularly when that centralization is placed in NCES, a relatively young organization that has yet to completely prove its competence as a major statistical agency. There will undoubtedly be some short-term costs in efficiency from the standpoint of the other agencies. Nevertheless, those short-term costs should be off-set in the long run by reductions in the burdens placed on states and local school districts while at the same time improving the quality and usefulness of the data to policy-makers.

4.3 *Role of the States:* NCES *is largely dependent upon state education* agencies for data about states and local school districts. Surveys typically go to state data personnel even when they pertain to school districts or other subunits. If the state education agency can supply information from its own records without sending the survey along to local districts, it usually does so. The following three recommendations deal with survey flows, integration of general purpose and program data at the state level cost of data collection and compliance with Federal government requests.

4.3.1: *All surveys from agencies of the Federal government that require elementary and secondary education data from states and local school districts should be sent to the state education agency.* No surveys should go directly to local school districts. In short, the procedure that's generally observed in NCES should be applied to USOE program management bureaus and other agencies.

4.3.2.: *USOE procedures should be designed to encourage integration of general purpose and program data within the states.* The same kinds of problems exist in this area at the state level just as they do within the office. In fact, the problems may be worse. A recent study of the politics of Federal aid administration in six states noted that there were few efforts to coordinate and focus federally funded programs and that the need for such a focus was critical.[2] One mechanism for encouraging coordination may be through data collection procedures.

4.3.3.: *All routine data requests from USOE should require state compliance.* Failure to submit data should result in withholding of Federal aid to the state education agency. If the data are sufficiently important to the Federal government, compliance should be required. We recognize that this recommendation is not consistent with the views of approximately two-thirds of the CEDS representatives whom we surveyed—they prefer a voluntary system with incentives—but it is the most realistic way in which to get data when it is needed. On the other hand, such a requirement should place upon the Assistant Commissioner for Educational Statistics and the Commissioner of Education and the Advisory Committee that we have proposed responsibility for assuring states that data which are requested from the states are clearly needed in order to answer questions in the policy issue framework.

4.4.4: *The cost of providing the Federal government with information beyond those normally undertaken by state education agencies and local school districts should be assumed by USOE.* This is a principle that is easier to articulate than to operationalize. Procedures employed in the most recent Elementary and Secondary General Information Survey (ELSEGIS) are a step in this direction. However, more extensive funding by the Federal government raises a number of thorny issues. For example, some states (Michigan and New York) already do a great deal more than other states in collecting data for their own purposes. Also, through state administration budgets for Federal aid programs some funds are already available for these purposes. The example of New York State in which the statewide testing program is funded through the Title I administrative budget was cited in Chapter III. There are numerous examples in other states that are more difficult to disentangle.

5. *Analysis of Educational Data*

This is the second functional area to which we focus specific recommendations. The more critical and broad based elements dealing with the question of analysis of information about education were addressed in our first three recommendations. The following three recommendations are designed to implement these proposals.

5.1: *The USOE should have personnel on the staff of NCES trained in demography, economics, education, public finance, sociology and other areas of social science expertise in order to perform analysis of data.* Such analyses should focus on data regularly collected by the Office and be within the framework of the four broad issue areas discussed in Chapter VI.

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[2] *Federal Aid to Education: Decision-Making and Allocation,* Joel S. Berke, Michael Kirst, co-editors, D.C. Health forthcoming May, 1972.

5.2: *NCES should have an editorial staff assigned responsibility for insuring readability and clarity of publications.* Though an editorial staff cannot be thought of as a substantive addition to NCES, it may be the most practical way to make publications useful to policy makers who are not experts in education or statistics.

5.3: *NCES should have responsibility for anlyzing only ongoing, routinely collected data, including data collected as part of program management activities within the Office.* Longitundinal studies and in-depth analyses that occur only once or on an irregular basis—for example, the Coleman Report—should be the responsibility of the staff of the National Institute of Education or the independent, government sponsored research organization proposed in recommendation No. 3. Data collection for such studies should, of course, continue to be the responsibility of NCES.

6. Dissemination of Educational Information

What should be the format of a USOE publication series reporting on the condition and progress of American education? We recommend that there be three series of publications, each organized within the four issue areas of the policy framework.

6.1: *The first series would be a computer listing including tables of all data regularly collected about elementary and secondary education from state education agencies and local school districts.* These publications can be printed and disseminated almost immediately after the last data items from a survey are submitted by states and placed on computer tapes and edited. If these survey reports are oragnized by states or region such as census of housing and census of population reports, the time span between publication and the period for which the data apply can be shortened even more. Clearly, such publications will include no analysis, only raw data and computer generated analytical indices.

6.2 *The second series should be directed at readers who are laymen—policymakers, citizens, etc.—and would include considerable analysis.* The presentation would focus on clarity and would emphasize charts, bargraphs and other descriptive techniques that assist the reader in visually interpreting data. The focus of this series would be on the policy questions and the analyses would clearly draw upon non-USOE data in addition to NCES surveys when the use of such data are appropriate to dealing with the policy issues.

A significant component of this series should be early reports, possibly in a newsletter format, of the analyses of a single, concise set of issues for which data are available; or trends are clearly discernable. The current monthly report of the Assistant Commissioner for Education Statistical is a commendable step in this direction.

6.3: *The third series of publications should be focused on the in-depth analysis that would be the charge of the research organization proposed in Recommendation No. 3.* Such reports would appear as short monographs dealing with specific sub-issues within the policy framework. Like the publications in series 6.2, they would be directed at laymen, though the substance of the analyses should reflect an exceedingly high order of scholarly research.

SUMMARY OF GENERAL RECOMMENDATIONS

1. Data about American education must be analyzed.
2. To guide improvement in NCES information gathering, analysis and dissemination, an advisory committee should be created.
3. Create or fund a research organization roughly comparable to the National Bureau of Econmic Research to conduct independent, in-depth analysis of the state of American education and educational finance.

SUMMARY OF ADDITIONAL RECOMMENDATIONS

4. Data Collection

4.1 Office of Educational Activities:

4.1.1. General purpose data and data required for program management functions should be integrated

a. NCES should develop an inventory of data requests, forms, reports, individual items, samples and OE users

b. All requests for data to states (and local districts) from OE should pass through NCES Forms Clearance Bureau

c. Where necessary, legislation should be amended to facilitate coordination and to reduce duplication in the internal OE data program.

d. Appropriate staff should be assigned to accomplish tasks a and b.

4.1.2. Consistent with 4.1.1. the Belmont Project should be assigned to NCES. NCES staff should conduct a thorough review of all components of Belmont. Particular attention should be given to the extent to which Belmont serves policy information needs.

4.1.3. NCES should assign data collection specialists to a given number of states. Such specialists would (1) become expert in the data problems of the states to which they are assigned, (2) serve as a liaison person with SEA personnel and, (3) serve as a liaison between NCES and USOE program management bureaus for their assigned states.

4.2 General Forms Clearance:

4.2.1. All Federal agencies that request data from SEA's or local districts should have requests approved and processed by NCES Forms Clearance Bureau. This would include: Office of Civil Rights, HEW, Census of Governments, School Lunch, Department of Agriculture.

4.3 Role of States:

4.3.1. All Federal government data requests should go from NCES to SEA's. No requests should go directly to districts or schools.

4.3.2. Every effort should be made to integrate general purpose and program data within states.

4.3.3. All routine data requests from NCES should require state compliance. Failure to submit data should result in withholding of Federal aid to SEA for all administrative functions.

5. *Analysis of Educational Data*

5.1 The Office should have personnel on the staff of NCES trained in demography, economics, education, public finance, sociology and other areas of social science expertise in order to perform analysis of data. Such analyses should focus on data regularly collected and be within the framework of the four broad issue areas discussed above.

5.2 NCES should also have an editorial staff assigned responsibility for insuring readability and clarity of publications.

5.3 NCES should be responsible for analyzing only ongoing, routinely collected data, including data collected as part of program management activities within the Office. Longitudinal studies and in-depth studies that occur only once—for example, the Coleman Report—should be analyzed by staff of the National Institute of Education or the independent, government sponsored research organization proposed in recommendation No. 3. Data collection for such studies should, of course, continue to be conducted by NCES.

6. *Dissemination of Educational Information*

6.1. Publication Series: Three publication series should be produced relevant to the condition and progress of American education, each organized within the framework of the four issue areas.

6.1.1. The first series would be computer listing and tables of all regularly collected data placed on computer tapes. These publications can be printed and disseminated almost immediately after last data items are submitted by states and placed on tape. If publications are produced by region or state, that is, anything smaller than the nation as a whole, the time span between publication and period for which data applies can be shortened even more. Clearly, such publications will include no analysis, only raw data and tables with computer generated analytical indices.

6.1.2. The second series would be directed at readers who are laymen—policymakers, citizens, etc.—and would include considerable analysis. The presentation would focus on clarity and would emphasize charts, bar-graphs, and other descriptive techniques.

6.1.3. The third series would be produced by the NIE or the research organization proposed in 4.3 above and would also be focused at laymen. Such reports would appear as short monographs that reflect in-depth analysis of specific sub-issues within the issue framework.

Appendix B

THE NATIONAL CENTER FOR EDUCATIONAL STATISTICS

NCES was created in 1965 to serve as the statistical arm of the Federal government's efforts in education. A part of the Keppel reorganization discussed in the previous chapter, the establishment of the Center was intended to elevate and coordinate basic information activities of the USOE. In that role NCES currently gathers, stores, analyzes and disseminates general purpose—as opposed to specific program management—educational information. A small amount of data collected by other statistical agencies of the Federal government (i.e., Census) is also included in the 55 series of publications.

The budget for NCES activities grew more than six fold during the 1960's from $.9 million to more that $5.7 million.[1] With the exception of statistical operations of the newly created agencies of the 1960's (the Department of Housing and Urban Development, 3.0 million; Transportation, 5.7 million; and the Office of Economic Opportunity, 4.9 million), the budgeted rate of increase in data collection for education was greater than any other statistical center in the Federal government.[2] Nevertheless, at 5.7 million dollars, the NCES budget for fiscal year 1971 is far less than each of four other Federal government agencies whose missions closely approximate those of USOE. Table III–1 compares Congressional appropriations for 1971, personnel ceiling for both years, and the amount of change in dollars and personnel from one year to the next in those agencies.

The closest parallel to NCES in the Federal government is the National Center for Health Statistics (NCHS) within the Department of Health, Education and Welfare. The NCHS budget for fiscal 1971[3] was almost twice that of NCES; in 1972 it was almost three times as large. More important, NCHS received a larger single increase ($5.2 million) from 1971 to 1972.[4] That increase of $5.2 million was almost as large as the total budget of NCES in 1971. Equally important are the differences in staff sizes. NCHS had more than three times the staff of NCES in 1971 and almost four times the staff planned for fiscal 1972. Other agencies included in the table employ up to twenty times as many staff. Even though such comparisons among statistical agencies cannot be definitive, they do reflect the comparitive value that both the executive and legislative branches of government have placed on the collection of accurate, timely and useful data.

MANPOWER AND DOLLAR RESOURCES OF THE GENERAL PURPOSE STATISTICAL AGENCIES, FISCAL YEAR 1971 AND FISCAL YEAR 1972

Statistical Agency	Budget in millions			Personnel ceiling		
	Fiscal year 1971	Fiscal year 1972	Changes	Fiscal year 1971	Fiscal year 1972	Changes
National Center for Educational Statistics	$5.7	$6.1	$0.4	148	157	9
National Center for Health Statistics	10.1	15.3	5.2	459	583	124
Statistical Reporting Service, Department of Agriculture	18.6	18.9	.3	1,339	1,355	16
Bureau of Labor Statistics	26.4	29.4	1.8	1,416	1,562	146
Census	22.6	24.4	1.8	3,566	3,724	158

Source: Department of Health, Education, and Welfare.

These disparities are particularly surprising when viewed in the context of the activities being surveyed. In terms of gross measures of the subject areas covered by each of the three statistical agencies, education generated the largest dollar volume in 1970. But education is not only a major national effort fiscally, it has been the focus of intensive criticism and concern on official and unofficial state and local levels in recent years. Indeed, for well over one hundred years Americans have placed much of the burden for relieving social inequities on their system of public education. Given the serious need for a program within the U.S. Office of Education that is capable of producing high quality, useful information to undergird intelligent public policy decisions, there appears to be generous room for budgetary growth in the area of education.

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[1] *Federal Statistics*, Report of the President's Commission, Volume I, Chapter 1, Appendix B, pp. 41–42.

[2] The $.9 million covers only routine operational expenditures including personnel salaries and benefits as well as cost of data collection and publications. Special studies such as the Coleman Report (1966, approximately $1 million) and computer facilities (1967, approximately $1 million) are not included. However, the longitudinal study in higher education currently underway is included. If it were possible to sort out all such additional statistical activities of the early and mid-1960's, the actual rate of increase would appear considerably smaller than it does with the budget data used here.

[3] NCES is the only one of the five agencies included in the table whose budget is not subject to line item appropriations by the Congress. Rather, Congress approved a USOE budget that included an additional 7 million, but when funds for research were cut in the OE budget, NCES was reduced by that amount to free-up extra funds for research. Budgets for each of the other agencies were as indicated.

[4] Unless otherwise stated, all dates are for fiscal years.

GROSS MEASURES OF SIZE OF SUBJECT MATTER AREAS COVERED BY GENERAL-PURPOSE STATISTICAL AGENCIES, U.S. TOTALS FOR FISCAL YEAR 1970

Statistical Agency	Measure of size	Dollars in billions
National Center for Educational Statistics	Educational expenditures (public and private)	$70.6
National Center for Health Statistics	Health expenditures (public and private)	67.2
Statistical Reporting Service (Agriculture)	Realized gross farm income	55.6

Source: Department of Health, Education, and Welfare.

Our primary focus in this report is on information about education up to and including high school. Table III-3 illustrates that approximately 60 percent of the funds and about half the personnel involved in surveys are devoted to the areas of elementary and secondary including vocational education.

NCES RECURRING SURVEY EFFORT—FISCAL YEAR 1971

	Related publications scheduled for completion	Total research and training dollars	Related staff
A. Recurring surveys:			
Higher education	17	$613	34
Elementary and secondary (including SSS)	20	934	25
Adult and vocational and library education [1]	6	73	14
Totals	43	1,620	73

[1] Includes higher education as well as elementary and secondary

While NCES is nominally the focal point for educational statistics,[5] the Center processes only 10 percent of all data submitted to USOE. The reason for this comparatively low proportion of data processing is that the great bulk of information supplied by States and local school districts to the Office is submitted to the program monitoring bureaus. Such data are used for internal program management and are rarely integrated with recuring, general purpose information. In many cases the surveys employed are required by legislation and, typically, fulfill no further purpose than the minimal requirements for the legislation.

Two examples illustrate different dimensions of this problem. Recent amendments to Title I of the Elementary and Secondary Education Act (ESEA) set precise comparability requirements for the intra-district allocation of resources. There can be no more than a 5 percent variation in local, state and other federal funds between the average of all non-Title I schools in a district and each Title I schools. USOE has a comparability report form that is made available to Title I administrators in state education agencies (SEA's). These forms, occasionally with minor modifications, are sent to each local education agency receiving Title I funds, in effect almost every school district in the United States.[6] For school districts without school-by-school budgeting and accounting—the vast majority—the task is massive. The City School District in Syracuse, New York, for example, estimated that more than 500 man-hours were required to complete the form in the Spring of 1970.[7]

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[5] Includes higher education as well as elementary and secondary.

[6] Two kinds of districts were excluded from completing the entire report. Districts receiving less than $50,000 were required to complete only one of three sections. Districts with one elementary school were excluded entirely.

[7] In subsequent years—the report must be completed for each of three consecutive years—the time required should be considerably less, of course.

Completed reports were then submitted to the SEA where compliance and district plans to make corrections are assesed. USOE may ask the SEA's to send reports for those districts in the Belmont sample[8] to Washington, but this is far from definite at this time.

Furthermore, there are no plans to incorporate the data from the comparability study into the NCES information program and the Center's Director has little knowledge of the study. At a time when NCES is placing major emphasis on developing good relationships with the states, and some SEA's are in fact refusing to honor USOE data requests, the lack of integral involvement of NCES in planning and administering the study can be deplored. Since the study is required by law[9] and there has been increasing concern expressed to NCES about school-by-school disparities in large cities,[10] coordination wtih the Center could have resulted in at least making the unavoidable burden for local districts serve multiple purposes. Such coordination will only occur as a result of clear direction from the Office of the Commissioner.

A second example of the extensive data collection that occurs outside of NCES is also related to the controversial Belmont survey. Belmont was designed to gather data for program evaluation from school districts and schools. A subsidiary purpose was to combine information collected through several surveys into one survey. The principal instruments are the Consolidated Program Information Report (CPIR) on which data about all federal programs at the school district level are reported, the Elementary School Survey (ESS) and the Secondary School Survey (SSS).

Belmont was conceived and implemented within the Bureau of Elementary and Secondary Education. The CPIR, EES and SSS require states and local districts to submit almost as many data items as all of the Center's elementary and secondary surveys put together, yet NCES has little involvement. In most SEA's separate "Belmont representative" is selected by the Chief State School Officer and his work is done independently from that of the representative to the existing Committee for Educational Data Systems (CEDS) who regularly deals with NCES.[11]

This separation of Belmont from NCES has been partially alleviated by a minor reorganization within the Office of Education. NCES and Belmont are now directly responsible to the Deputy Commissioner for Development. As a first step toward better coordination within the Office, this reorganization is to be applauded. In the long run, however, a more encompassing unification of information activities may well be in order.

The Title I Comparability Study and the Belmont Project illustrate the difficulty of developing a comprehensive, integrated, policy-oriented information program for education. State and local school districts rebel against the extensive burden of supplying data, a burden that is only partially offset by federal funds (ESEA Title V and state and federal fund administrative budgets). Though NCES has major responsibility for reducing these problems, it has little or no control over many of the problems generated by practices within other branches of USOE.

Recent studies and recommendations concerning information activities

During the past eight years three independent studies of the activities for which NCES is responsible have been conducted. Each study observed a number of problems and suggested recommendations which warrant our attention.

The first study took place in the Fall of 1963 when the then Commissioner of Education Francis Keppel appointed an Advisory Panel on Educational Statistics. The panel was composed of 15 distinguished educators chaired by O. Meridith Wilson, then President of the University of Minnesota. The Wilson Committee made a number of recommendations, some of which were incorporated in the 1965 reorganization of the U.S. Office of Education that resulted in the creation of NCES. That reorganization overcame some of the problems we have listed as observed in the early 1960's. However, the three most important findings of the Wilson Committee are as current and as relevant today as they were then. Indeed, the Wilson Committee described them as "chronic", but we would trust that they are not so "chronic" that they cannot be resolved. They are as follows:

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[8] The Belmont survey is designed to collect data for USOE program evaluation purposes. It will be discussed in greater detail later in this report.

[9] This is somewhat of a misnomer since the study is not specifically required, only the results are.

[10] As an example, the Committee on Educational Finance Statistics recommended that NCES collect school-by-school data on a sample basis in its report of March, 1970.

[11] At a number of places in this report we have drawn upon interviews, with CEDS representatives and their colleagues in State Education Agencies. The CEDS representative is the personal envoy of each Chief State School Officer to NCES for education data. All CEDS representatives convene once each year to discuss implementation of USOE data programs. In addition, a CEDS Planning Committee meets more frequently usually with Office Staff. NCES seeks the advice of CEDS in both long-range and short-term planning for data collection.

The Final Report of this project will make direct use of a mail survey to all CEDS representatives. Their attitudes and opinions will be considered in developing recommendations for long-range planning. The questionnaire for the CEDS survey is included in Appendix A.

1. *Long delays in the completion of many studies and reports.*—As we noted above, this particular problem actually increased during 1965–66 with the simultaneous occurrence of the reorganization of the Office of Education and the implementation of ESEA. NCES has yet to recover from the effect of those two events, and there is little evidence that this problem will be resolved in the near future.

2. *Serious difficulties in the reporting of basic information by initiating sources, involving some lack of adjustment in the request for data to the form and circumstances of local and state record systems.*—This problem points out the dependency of the Federal government upon the data supplying capabilities of states and local school districts. We will discuss this in greater detail in the following section, entitled "Looking Ahead at USOE."

3. *Less than adequate ascertainment of the needs of users of educational statistics and poor anticipation of new needs.*—This particular problem will be discussed in chapter IV. We note in that chapter that NCES has given very little attention to the specific needs of an important category of users of educational data: Congressional and top level, Executive Branch officials. NCES has attempted through a recent User's Study to ascertain the needs of users of education data. However, it is abundantly clear from that study that no distinctions were made among the kinds of users or their respective needs.

A second and somewhat different study was conducted by the House Committee on Education and Labor in 1967 of the entire U.S. Office of Education. The House study pointed out several problems.[12]

1. *The lack of availability of computing equipment used solely by NCES.*—A number of studies from 1950, 1957, 1963 and 1964 recommended that the Office have control over its own computing facilities. As of 1967 that had not occurred and apparently has not today.

2. *The absence of information about the non-public sector of education including private, parochial, commercial and technical schools.*—This problem extended even to those schools that were receiving federal funds. In very large measure this problem continues to exist today.

The final study that has bearing on this project is that conducted by the Committee on Educational Finance Statistics, commonly called the Kelly Committee after its chairman Professor James A. Kelly of Columbia University. The Kelly Committee was probably the first to focus on the critical lack of policy orientation in NCES and USOE data collection efforts. In the Committee's report to the U.S. Commissioner of Education James A. Allen, Kelly noted.

> Intelligent decision-making requires that decision makers at all levels of government . . . have available to them the most up-to-date, relevant, and comprehensive data that it is possible to collect concerning (1) the nature of the problems to be solved, (2) the flow of Federal funds to states and local school districts and (3) the impact of that aid on children.[13]

The Committee concluded that though important efforts were being made to provide necessary data, gaps in essential information continued to exist. Areas in which data are required but unavailable included:

1. Recognition of lack of comparability between USOE data and that collected by the Bureau of the Census.

2. Data at local, state and national levels relating Federal aid by Title as well as by Act to the incidence of a target population at the school building level.

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[12] Committee on Education and Labor, House of Representatives, 89th Congress, "Study of the United States Office of Education: Report of the Special Subcommittee on Education." Washington, 1967, pp. 758–763.

[13] "Report of the Committee for Educational Finance Statistics: Recommendations for Data Collection Analysis and Publication," James A. Kelly, Chairman, March, 1970, p. 2.

3. School-by-school demand or need for educational services.
4. School-by-school allocation of resources including Federal aid in large cities.
5. Lack of data about Federal aid that reaches children by means of non-USOE administered programs.

To overcome these data inadequacies, the Kelly Committee recommended that school finance data be organized around analytical common denominators relevant to significant public policy issues, expansion of the Elementary and Secondary General Information Survey (ELSEGIS) and Belmont samples and programs, and greater coordination with other agencies of the Federal government collecting educational data.

Nine specific recommendations were made for accomplishing these objectives. A number of the recommendations were proposed for the 1971 fiscal year budget, but did not survive Office review. However, several have been incorporated in the budget for fiscal 1972.[14]

Looking ahead at USOE: Common Core of Data for the 70's

One of the more unfortunate by-products of a study such as ours is the continuing focus on what is not being done. Current efforts and plans for the future are typically not given the same attention as are the gaps or shortcomings in data procedures. Compounding this tendency is the unavoidable time lapse that surrounds the subject of our examination, since the time between the commencement of planning a particular change in an information program and the collection, analysis, and eventual publication is measured in years, not in months. On the one hand, we examine shortcomings in publications planned three or four years ago and base our judgments on conversations with users of the same information. On the other hand, through our conversations with staff of the NCES and the U.S. Office of Education, we learn of plans to correct many of the problems cited, but the corrections will not be reflected in publications for another three to four years.

The Common Core of Data of the Seventies (CCD–70) is an example of the latter. CCD–70 is desgined to achieve comparability and overall economy in the nationwide effort to secure educational data needed on problems in educational practice and educational finance. It will be directed at fulfilling the need for (1) coordination of federal/state planning toward compatible information systems, (2) financial assistance for planning and operation of coordinated data systems, (3) financial assistance and technical services to the states, and (4) technical-statistical development of systems of educational data in education.

The premise underlying CCD–70 is based on a proposition common to massive information systems in all spheres of activity: information available at the top will be not better than that produced at subordinate organizational levels. Thus, CCD–70 is putting its eggs in the basket of improving the information system capabilities in the 50 states and 6 outlying territories. Federal grants on a 1 to 3 matching basis would be available to states. Costs would run from an optimal $60 million in the first year to $100 million per year by fiscal 1977. Greatly expanded technical and consultant services to states would be provided. While the staff of NCES would more than double within the next few years, it is a very clear purpose of the Office of Education in CCD–70 to first meet the information needs of states.

USOE is to be commended for initiating plans for a comprehensive, integrated information system in education. Clearly, no other national organization or agency has this capacity in education information systems. In addition, it is our feeling that a cost of $100 million dollars a year may be unavoidable if the nation is to have available the kinds of information that are requisite to intelligent educational policy formulation.

There are, however, some cautions that we would like to suggest. First, as indicated earlier in this report, there is great variation in the needs of the 50 states and 6 territories. Such variation is inherent in a federal system and is in no way comparable to the integrated though decentralized administrative structures that characterize a typical large industrial company, or, for that matter, the many agencies of the Federal government. One of the important observations that we have made from talking with personnel in various state education agencies is that the uses of and the interest in certain kinds of information vary dramatically from state to state. Serious question should be raised about the intent to achieve comparability and integration through the device of meeting the needs of individual states.

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[14] A summary of the Kelly Committee recommendations and their current status is in Appendix C.

Second, if one assumes that such a task can be accomplished as part of CCD–70, he must recognize that the desired outcomes will occur only after many, many years of intensive development. Those information needs that are peculiar to the Federal government may not be adequately fulfilled for a long number of years if we wait for information systems in each of the states to attain an adequate level of usefulness. A somewhat comparable situation exists in the state of California today. Funds for improving the educational information system in California have been directed at improving the systems in individual school districts. The result is that California's state information system is currently disjointed and inadequate. Though in the long term the system may be superior and more sophisticated than those of other states, that pay-off appears to be several years away.

Our third area of concern about CCD–70 is addressed to a problem area that cannot await a long-term solution. As we have noted earlier and often in this report, the usefulness of NCES publications to policy makers is largely a function of three interrelated factors: (1) the organization of publications and data around policy questions, (2) the level of analysis employed, and (3) the readability of the material. NCES has given increasing emphasis to the need for a policy orientation to educational data in recent years. Such an emphasis is mentioned in several places in documents concerning CCD–70. But one quickly gets the impression from reading the rhetoric about CCD–70 that attention is focused on strategies to be employed in collecting data about education and very little, particularly at the outset, on the question of "data for what." No matter how useful the strategy, a comprehensive program for collecting, analyzing and disseminating information about the condition and progress of American education wil be doomed to failure unless it begins with a careful selection and statement of the issues and resulting questions for which data must be collected. Only then and on this basis can one turn to a critical analysis of existing data and determine what needs to be obtained to fill existing gaps. While this effort is certainly a purpose of our study, the absence, at the outset of CCD–70, of a high priority for the identification of issues suggests that any expenditure of funds close to that being contemplated by the USOE may indeed be futile.

Also missing is a necessary focus on the development of a series of readable publications structured around policy issues. NCES is to be applauded for its current emphasis on enhancing the statistical integrity of education data as well as in securing the level of expertise available to the Office and, in the future, to states. However, concern with statistics and the needs and problems of State Education Agencies appears to be taking precedence over the interests and concerns of policy makers in the Federal government.

When we turn to the question of analysis, we know that a number of potentially severe problems exist. The 1963 report of the Advisory Panel on Education Statistics addressed itself to such concerns in a manner that has relevance today.[16]

"The data in the basic statistical series should be collected and reported so as to reduce to a minimum questions or suspicions concerning them. While these statistical data should be accompanied by full explanation and objective interpretation, it is desirable that the Office not be involved in controversial interpretations. For this purpose the panel distinguishes two levels of interpretation: (a) a first level which illumines data by explaining how they were collected, by appraising the results obtained, by relating them to other factual matters, and by deriving those valid conclusions or implications which are purely analytical or logical; and (b) the second level which interprets in a broader sense on the basis of disputed value judgment or assumptions or general views of any sort which are not beyond reasonable differences of opinion.

"The Office should provide the first level of interpretation since raw data simply cannot be understood without some such interpretive guides. It is as bad to publish ambiguous and misleading reports as to publish inaccurate ones. Moreover, the Office may be expected to be better informed about the operational and factual information that are needed for the interpretation of

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[16] "Report of the Advisory Panel on Educational Statistics," U.S. Department of Health, Education and Welfare, Office of Education, December, 1963, pp. 18 and 19.

> its own statistics. *The office should not undertake to work out and present the second type of interpretation.*"
>
> When data are organized within a policy format, it is exceedingly difficult to make a clear distinction between these two levels of analyses. One of the subjects of the final chapter of this report is alternative ways in which this particular kind of problem can be resolved. Such alternatives will include utilization of existing mechanisms within the USOE as well as proposed mechanisms outside of NCES and USOE. The point to be made here, however, is that the problem is not in any way addressed in USOE plans for CCD–70.
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> The final concern that we have about USOE plans for CCD–70 focuses on that vast array of data used by states and the Office of monitor Federal aid programs. We noted earlier that NCES currently collects less than 10 percent of all data submitted by states and local school districts to the USOE. The Title I Comparability Study was cited as an example of a major project of the Bureau of Elementary and Secondary Education that placed enormous demands upon local school districts, but was conducted without involvement of NCES. Perhaps more critical, there are no plans to integrate comparability data into USOE information publications—or simply to make the data available on computer tape.
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> If CCD–70, or any design of a comprehensive education information system is expected to deal with the sources of major data problems, it must include provisions for integrating *all* USOE collections, analysis and dissemination activities. Distinctions among policy information, management information, compliance information, etc., are relevant only in terms of the nature of the analytic report or publication that is produced from the data. The producer of the data—local school district or state education agency—is primarily concerned with supplying the original information. The particular data item, e.g., per pupil instructional expenditures, should not change with the ultimate use to which the data will be put. In short, all data collecting, storing and intergrating for USOE should be the responsibility of NCES.

Dr. BERKE. Thank you. Let me say, that as we conducted our research for the President's Commission we found we were plowing new ground. Recommendations similar to ours had been cited previously and we had a sort of eerie feeling as we went forward that this had all happened many times before. There is consistency I think, in the direction that most of the recommendations take, but when all is said and done, the major need is not for carefully detailed recommendations or ambitious administrative reorganization, although both may be necessary. The critical need is for commitment, commitment to the notion that improved policies for American public schools must be undergirded by systematic study and analysis.

In enterprises as vast as education, systematic analysis requires timely, reliable, and policy-relevant statistics. Such statistics will be developed only when directors of the Office of Management and Budget, secretaries of Health, Education, and Welfare, assistant secretaries for Education, and U.S. commissioners of education place reporting on the condition and progress of education high on their agenda of responsibilities.

The informed concern of this subcommittee will encourage and stimulate such a commitment. We are delighted that you have signaled the intention of the Congress to concern itself with this important area and we are honored that you have invited us to present our views today.

Dr. Firestine and I will be happy to respond to any questions you may have.

Mr. BELL. Thank you very much for a very excellent statement. I have just two questions.

I am sure you have seen the provisions of the Senate bill. Would you comment as to the creation of NCES or a seperate agency?

Dr. BERKE. I would like to avoid responding to that question because I don't have an informed view on it. My field is not bureaucratic organization. I can see some advantages and some disadvantages, but I am a scholar of school finance and while I have looked at the statistics question, I don't have an opinion as to whether shifting it or changing the agencies around will alleviate the problem.

Mr. BELL. Wouldn't the fact that there already are problems of coordination tend to make you feel it should be held together as one?

Dr. BERKE. I would agree with that. Coordination and the limited proportion of educational data which the center has control over has certainly been a problem. I would agree with your statement.

Mr. BELL. What have the major users of NCS products done to require a higher budget for NCS?

Dr. BERKE. I am afraid I don't know how to respond to that. I assume from time to time that the major users have made known their views. I know a conference convened by the Federal statistics users group is going to be held this spring. I am sure these questions will be of interest to them. What their activities have been to date, I don't know.

Mr. BELL. Thank you.

Mr. QUIE. Dr. Berke, that is an excellent statement and I should say something we expect from you because you have demonstrated your competence.

Now what I am struck with is that you say the critical need is for commitment to the notion that improved policies for American public schools must be undergirded by study and analysis.

I recognize that unless there is that commitment we could have many agencies without too much effectiveness. You were involved in the Fleischmann Study in New York. To what extent did this become a part of the whole policymaking activity? To what extent did Nyquist use that in the legislature in New York, which I might say was an outstanding report?

Dr. BERKE. Let me respond to that in a broader context than just the Fleischmann report. That report had very little impact in New York State. What we have learned can be illustrated by pointing to the Florida Governers Conference. Ninety-five percent of their recommendations were turned into bill drafts shortly after the Commision had reported.

One of the differences, I think, was that the group responsible for organizing the study was a group composed of the policymakers who would be involved later on in the process of passing legislation and implementing it.

There was a tight fit between the concerns of the policymakers in education and the active citizen groups in education and other fields—a tight fit between them and the research activities that went forward.

In a sense, one of the obvious parallels is the importance of having data, statistics information and studies related in one way or another to the policy needs felt by people in the field.

Let me say that I think that NCS has attempted to meet with education and others in the last few years. I would say an institutional mechanism of some kind would make that more effective. That is why we mentioned the advisory committee.

Mr. QUIE. What you are saying in effect, is that in addition to an advisory making committee, we ought to have some members of Congress on it who might be in a position to implement legislation. Is that what you are saying? That is what it sounded like when you mentioned Florida.

Dr. BERKE But there is also the danger of the politicization of the statistical process which would be undercutting, but I think there are mechanisms which could be developed that could make that possible.

Mr. QUIE. I notice the Fleischmann Commission was not involved in continuous data gathering such as NCS. Looking at the possibilities of what the Fleischmann Report could do for the State of New York if fully utilized by the policymakers of New York, have you any intention to bring it to their attention? It would have the effect of the one in Florida which will be forthcoming.

As you notice we have studies all over in the archives that have no impact. Once in a while you do have one which will make an impact. Now does New York need another study?

Dr. BERKE. No, I don't think New York needs another study. Do you want me to adress my remarks to the state level?

Mr. QUIE. Yes.

Dr. BERKE. Let me respond directly to what you are asking. We have found as we looked at States which have made progress on the basis of study activities and have in particular changed their financial structures in recent years that all these things happened at a period of development. None of them happened as suddenly as newspaper reporters suggested. The Minnesota miracle of 1971 or whenever it was, came about partly because a group in Minneapolis whose name I don't recall, but a group of public spirited citizens——

Mr. QUIE. Citizens League.

Dr. BERKE [Continuing]. Had gathered information on tax disparities and so forth. That became a basis of the Governor's campaign in Minnesota. We have found that something out of the ordinary generally comes along.

The court cases or a blue ribbon study are examples of this; something which grabs the community by the lapels and shakes it and says, this is not a time for policymaking as usual.

We have seen that political leadership was critical in all instances. The educational institutions did not carry the ball. The people who formulated the notion as to what ought to be done were legislative leaders, legislative staff, governors.—political leadership.

We also found that measures which finally came out were measures which accommodated a range of interests. They were not the pure theory of the textbooks. Maybe they were better than the pure theory in the textbooks in many cases.

I hope that has been helpful.

Mr. QUIE. That is helpful because I notice you have taken a look at studies and could give us some good advice.

Dr. **Berke**. I might add, since you asked, that it was not the state educational department statistical units which provided most of the information which made the difference. Some of the basic terms, I suppose, were drawn upon, but it was the development of analytical reports and new ways to look at the statistics that fit into the system.

Mr. **Quie**. Who developed the type of information to be gathered in the Fleischmann Study? Who were the analytical statistical people? Did they come out of Syracuse University?

Dr. **Berke**. As one of the contractors for the Fleischmann Commission, Syracuse University and our Center prepared a number of studies for the Commission. That work, as I think you know, is now available as a book published by McCutchan in 1972 (Financing Equal Educational Opportunities, Berke, Campbell, Goettel). However, in addition to our work, the Commission drew upon many other consultants and had a staff of its own. Our work was used as background research and much of it did not appear in the official Fleischmann Commission Report.

Dr. **Firestine**. I wonder if I might add one thing. That is, I think from my knowledge of the Fleischmann work which is indirect and of my knowledge of some of the other work we and other people are doing in other States, the problem of acquiring raw data is not a major. We don't seem to have run into a roadblock at any point that I can recall nor am I familiar with many other people in our situation who run into difficulty in obtaining the raw data to complete their analysis.

I think the need is for individuals or groups who are available and capable of doing the right kind of analysis from the data which can be obtained from State sources. It is not a matter of collecting new pieces of information from their original genesis.

Perhaps in that is a suggestion that some of the future work of NCS in their future effort, you gentlemen have all expressed some concern in the time involved. Greater utilization may be made of State data in terms of quick turn around, particularly with selective pieces of data, then perhaps the broader scope of data eventually needed.

Dr. **Berke**. I would like to add one thing to that. One of the problems the Fleischmann Commission had was having to turn primarily to contractors for the development of much of their work. I think this is an unfortunate program. For the Fleischmann Commission it makes some sense, but certainly a center of gravity, its own staff, within the Fleischmann Commission would be more useful. As it turned out, they had to turn around and quickly do some additional work on their own. An organization which does not have its own staff familiar with its own workings and able to integrate these things will have difficulty. That is one area of concern.

Mr. **Quie**. Let me ask you about the areas in which the National Association of Progress is doing its surveys. Do you think NCS could make an analysis as to citizenship, writing, music, mathematics, social science, reading art and career and occupational development?

Dr. BERKE. My understanding of the National Assessment is not great, but my recollection is that it is designed in such a way that you really can't pull out those kinds of jurisdictional or geographical units. Without commenting directly on National Assessment and as a researcher, I would be delighted to have that data right down to the school level as well as by state.

Dr. Firestine has been assessing information based on State programs so that we can integrate testing data with our fiscal data to deal with the type of questions you have been presenting.

Dr. FIRESTINE. It is difficult when you are talking about programs such as the one you mentioned, Mr. Quie, to come to a good understanding among the various states as to the extent the programs are actually comparable from one place to another.

This is true, certainly, in any kind of an evaluation setting. I think it is also true when you get down to fairly detailed programs of activities as to what is being included as to numbers of individuals taking part, expenditure of funds for a particular subfunction or purpose. The more detailed you get, the easier it is for States' individual definitions to be helpful.

Again I am sure the problems of the people at NCS are of this nature. That is, when it comes time to check the reliability of the data, you have to go back and make sure the definitions you had at the outset are the ones being applied, or when there are questions as to how data should be reported, at what level that decision should be made, and I think those definitions vary across the States. I don't think there is anything that anybody can do about it.

Mr. QUIE. What happens to ~~the~~ kind of opposition that this might lead to, some accountability requirements? To me that is one of the hidden forces which prevents us from accumulating the statistics we need.

As I recall there was a study that really had an impact. It was done by the Defense Department and HEW, I believe, and it took a look at the mental examination for preinduction for Selective Service. At that time they did compare States; Minnesota ranked the highest, South Carolina felt very badly because they ranked the lowest.

Later, their Governor, came in and said, "We have finally reached the goal we were shooting for. One half our students graduated from high school."

To what extent do you think that kind of opposition from the educational community is going to prevent us from ever finding the information we need?

Dr. BERKE. There has been a traditional opposition in education to comparative data. I think it is a real force to be reckoned with but education has learned it has to respond more than it has in the past. We are no longer leaving it to the educators to control the policymaking in education.

If there is a parallel to assessment and accountability it means this will have opposition, but States have moved in this direction, and as people ask for this kind of information and require this kind of information, it will become available.

I am optimistic by nature and I believe that in the long run rationality will prevail. I think providing us with the tools to understand the problems we are dealing with is a basic need in a democratic society. So I think this is an area that must be presented and it will come around.

Mr. QUIE. I share your views and I hope if the Elementary and Secondary Act gets extended, we will have much more information than we had last year.

Mr. BELL. Thank you, Mr. Quie. I would like to give the Democratic staff member, Mr. Jennings, an opportunity to ask a few questions.

Mr. JENNINGS. You can always be relied upon for a consistent statement, Mr. Burke.

I would like to ask two questions. It seems from the administration's testimony today that, unless it is required by law, things will pretty well muddle along as in the past. What types of material do you think should be required? If you don't want to answer this right now, would you supply something for the record? We would appreciate it.

Dr. BERKE. We would like to supply a statement as to the types of material mandating the data but without some funding and staff, it is an empty exercise.

Mr. JENNINGS. Except it is a pressure play. If you are required to do something by law, sometimes it is easier to get money from the appropriation.

You made the point that the National Center for Educational Statistics has an inadequate staff and that you have compared it with other centers. What level of civil service positions do you believe should be placed in some type of center, whether left in OE or not, in order for them to adequately function as a statistical center? This would be in light of the type of data you specified in your first answer, I would imagine.

Dr. BERKE. I think clearly it requires some substantial increase in the professional levels in terms of GS numbers. I am not a Federal employee and it would be difficult for me to respond. But if we are talking about doing the kind of things by analysis indicators that tell us about trends, patterns, and policy needs, the requirement is for people with some substantial training, and I assume fairly high professional levels.

Mr. BELL. This concludes the hearings today. Thank you very much for being here, Mr. Berke and Mr. Firestine.

[Letters submitted for the record follows:]

UNIFIED SCHOOL DISTRICT NO. 1,
Racine, Wis., April 29, 1974.

Mr. CARL D. PERKINS,
Chairman, Committee on Education and Labor,
House of Representatives
Washington, D.C.

DEAR SIR: I am appalled that the Federal Government is requiring certain school systems to complete the Consolidated Program Information Report (CPIR) for the years 1972–73. This extensive report was imposed upon us under the rationale that it would eliminate other reports. This it has not done. We still have numerous reports demanded by our State and Federal offices concerning our individual *federal programs* such as *ESEA Title I & III, Head Start, Follow Through, Career Opportunities Program*, and others. Much of the information, perhaps all, is available in various other reports already in Washington.

I have filled out the CPIR in years past, and have never heard of any use for the collected material, and I have the suspicion that it has suddenly reared its ugly head again only because federal money has been released from impoundment and must be spent regardless if any benefit will accrue. Perhaps this explains why this apparently useless monster has again been released upon unsuspecting school districts across the country.

It is perhaps difficult for anyone who has not gone through the preparation of this report in a large school district to understand the work and cost involved.

To complete the report we must gather facts and figures from all of our different federal projects, combine them, then enter them into categories and sub-categories in different forms from those required in the individual federal project reports. Furthermore, this comes at a time when a flood of impounded monies have been released from Washington and our federal program departments have extreme pressures of numerous immediate deadlines to meet. I understand we are to be given only until May 24 to complete the CPIR, although we have not even received the forms at this writing. This means that a number of our personnel will have to go on a crash program, spending evening and weekends gathering and processing material which seems to serve no critical purpose, and which exists (piecemeal perhaps) in Washington offices already.

Furthermore, the material requested is now old. Certain of the programs have been closed out, i.e. their funding has terminated the personnel of those programs may still be in our employ or not. This situation and the immediate deadline will undoubtedly effect the quality of the figures that will finally appear on the report.

The cost to our District in time and materials to prepare this report will be measured in thousands of dollars, whereas a token amount of $100 is offered for its completion. The one hundred dollar is given to a school district that has $1,000 worth of federal programs and the same amount to a school district, such as ours, that has 2 million dollars worth of federal programs. The ridiculousness of this proportionment serves to underline the negative feeling that those of us closely involved with the report have toward it.

Consolidation of federal programs for ~~education~~ should start in Washington. Until that mess of proliferating categorical special-interest so-called aids is consolidated, is it fair to ask local districts to consolidate for them?

One thing the CPIR has done is serve as an object lesson in why local districts should consider very carefully before applying for federal programs since the districts have no control over what may be imposed upon them *after* the fact. The CPIR is a convincing illustration of that point.

Inherent here are two questions at least: Of what use is the CPIR? And must we complete it, since the information has been submitted in numerous other reports?

This letter then is a protest against the Consolidated Program Information Report.

Sincerely,

CAMERON SMITH,
Administrative Assistant,
Instructional Services.

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS,
Atlanta, Ga., April 15, 1974.

Representative CARL D. PERKINS,
Chairman, House Education and Labor Committee,
Washington, D.C.

DEAR MR. PERKINS: I read with considerable interest last week your statement concerning the inadequacy of our present education statistics. I have been troubled that good base-line statistics are not generally available to educational administrators, foundation executives, and government officials; these are persons who need to know what progress has been made as a result of various programs and where significant educational deficits still remain.

I have been particularly concerned with trying to develop an educational data collection and dissemination system regarding the minority and poverty youth of our southern region. I have felt that we need an annual report so that persons who are responsible for providing educational programs for this portion of our population can better evaluate progress. I have prepared a prospectus on this topic and am seeking foundation funding for it.

The program with which I currently am associated, Project Opportunity, has sponsored talent search and encouragement programs in two high schools in eastern Kentucky—Lee County High School and Breathitt County High School. Although we feel the programs have been somewhat successful, we would be in a much stronger position to evaluate our results if we had more adequate base-line data.

We hope that your efforts to secure better educational data will be successful. Please call upon us for any help which we might offer in this regard.

Sincerely,

HUGH R. FORDYCE,
Director, Project Opportunity.

[Whereupon at 12:15 p.m., the subcommittee adjourned, to reconvene subject to call of the Chair.]

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APPENDIX I

[Questions submitted by Chairman Perkins to Commissioner John Ottina, and the Commissioner's responses and relevant materials follow.]

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE,
OFFICE OF EDUCATION,
Washington, D.C., May 23, 1974.

Hon. CARL D. PERKINS,
Chairman,
Committee on Education and Labor,
House of Representatives,
Washington, D.C.

DEAR MR. CHAIRMAN: Thank you for your letter of May 10 requesting additional information on educational statistics to supplement my testimony of May 7.

The internal OE study to which I referred in my testimony, *Proposed Establishment of NCES as Seperate Organization within the Education Division*, is enclosed. It concludes that significant disadvantages might arise from the separation, while many sought-for advantages are intrinsically questions of investing sufficient talent and funds in the program to provide an optimum program of educational statistics.

I plan to furnish other materials requested and responses to the questions within the next few days.

Sincerely,

JOHN OTTINA,
U.S. Commissioner of Education.

Enclosure:

PROPOSED ESTABLISHMENT OF NCES AS SEPARATE ORGANIZATION WITHIN THE EDUCATION DIVISION

S. 1539 proposes the establishment of a separate agency within the Division for the collection and dissemination of educational statistics. A major part of the activities of the National Center for Educational Statistics (NCES) would be transferred from the Office of Education. Additional responsibilities would also be undertaken by NCES.

We have concluded that the creation of a separate agency for statistics would not necessarily achieve the assumed goals of enhancing the quality and timeliness of data or augmenting the amount of data available to the public; likewise it would not necessarily lead to an organizational consolidation of the collection of data. Furthermore, numerous problems would be created for OE program operation. Our conclusions are discussed in terms of problems which would result for education statistics and OE program operations.

PROGRAM FOR EDUCATION STATISTICS

Everyone wants more and better data sooner. To achieve these goals operations must be streamlined and resources must be increased. A new organizational location for NCES might not do either; in fact, because of increased coordination required and because of increased administrative overhead, it could mean that less of the existing resources could be assigned to direct statistical work.

Quality of Data Could Decrease

The National Board of Educational Statistics, being composed of a substantial number of representatives of non-Federal interests, would tend to de-emphasize the data needs stemming primarily from Federal program requirements. As NCES, in planning its program, would give weight to the priorities of the

Board, USOE services might receive less attention, thus forcing OE to collect more of its own data.

As a result, there might be a tendency on the part of USOE program managers to collect more data, and possibly different kinds of data, than NCES. This tendency would be difficult to combat because the primary focus of the effort to reduce respondent burden has come from NCES. NCES has taken important steps to lessen the respondent's burden of providing duplicative and extensive amounts of data through the establishment of general information surveys and through the establishment of general information surveys and through the development of the Common Core of Data program. The creation of NCES as an independent agency would jeopardize this progress to streamline the data collection process and to reduce burden on respondents. As demand on respondents increases, the nonresponse rate increases and the quality of statistics decreases.

The eight ex-officio members of the fourteen member Board would change each time there was a change of Administration. This could lead to abrupt changes in the program which would be far from conducive to the development of essential high quality statistical time series about education. Good statistical time series are the backbone of planning since they allow comparison of projections of the future under alternative policy assumptions.

Timeliness of Data Would Not Automatically Improve

Timeliness of NCES products is dependent on a number of factors which would not be changed through establishment of a separate agency. Specifically, the statistical program would still be (1) constrained by the staff available for contract monitoring and direct survey work, (2) subject to Federal procurement procedures for contracting outside work, (3) dependent on access to HEW Data Management Center computer capability, and (4) required to clear inquiry forms through OMB. While clearances within USOE, the Office of Public Affairs review of publications, and Automatic Data Processing Division review of requirements for computer programming and computer services, would be eliminated, clearance through the proposed NCES board and ASE might be added.

Some NCES Products Might be Curtailed

The creation of an independent agency requires certain start-up costs, as well as new continuing managerial services. All those direct services for program operations which NCES currently receives from the Office of Education must be built up separately. Some of these services are grant and contract administration, financial management, automated data processing, and system planning. Support services such as budget, legislation, planning, evaluation, and personnel must also be provided. While providing these services is not overwhelmingly expensive, it does create a need for new overhead, not required when furnished under the existing OE structure. Specifically, there would be a need to create Director positions, e.g., director of personnel, director of data processing, etc.

The dollar resources, staff ceiling, and in particular sufficient supergrade positions, all could, of course, be provided to the new agency. The agency would, however, be a part of, and its budget would be considered in the context of, the Education Division. The Congress in its appropriations actions is likely to be reluctant to augment program funds to meet the full educational statistics needs, in addition to providing the overhead costs indicated. The history of appropriations made available to the present National Center for Educational Statistics, in relation to the requests made, is not encouraging.

Resource constraints would thus likely restrict the performance of new functions and more effective conduct of on-going ones. As NCES attempts to carry out its existing responsibilities and the new functions proposed in the legislation, new and different priorities might be established by the Board. In brief, the danger is that high expectations for major advances in statistics would be engendered by creation of a separate agency, without the corresponding commitment of resources to make the new agency a viable one.

PROBLEMS TO USOE

While the goals of increased quality, timeliness, quantity, and statistical consolidation might not be achieved in any substantial manner, the creation of a separate agency would create numerous and significant problems for the Office of Education.

Problems to USOE Program Operation

NCES statistical activities are an integral part of Office of Education program operations. NCES statistics are rarely used for purely statistical analysis. Rather, they are used as a part of program operations or, in a broader sense, as a statistical basis for policy formulation, legislative development, short and long-term planning, and program evaluation. Dividing the educational statistics program from USOE program operations, which is highly dependent on NCES data, would impair effective program management for two reasons: (1) additional organizational structure would interfere with the close working relationship between program bureau staffs and NCES for the purpose of survey planning; and (2) access to NCES products, services, and expertise would decrease because of organizational requirements to "use correct channels."

Specifically, NCES provides a variety of services to USOE that are essential for program management. If a separate agency were created, USOE would not expect another agency to provide services that are intrinsic to USOE responsibilities. Functions and services integral to USOE responsibilities which should be retained, at the very least, are:

(A) *Formula Grant Allocations.*—The major portion of USOE financial assistance to SEAs and LEAs is based on formula allocations. States apply for financial assistance by submitting a State Plan. The Commissioner approves each plan. In order for NCES to compute the amount of financial assistance due States, the program staff collects and provides NCES with statistics.

(B) *Forms Design.*—Currently NCES provides forms design services to all OE operations. Because of the large number of financial assistance programs administered by OE, forms have become critical tools for consistent application requests and information reporting.

(C) *Program Planning and Evaluation Information.*—"Consolidated Program Information Reports" (CPIR) are information collected by NCES to meet essential program management needs. These reports are necessary for budget formulation and support, for program planning and evaluation, and for Congressional testimony.

(D) *Methodological Support.*—Although program data acquisition methodological support has been curtailed as other NCES priorities have taken precedence, NCES can still provide this service to programs when needed. If NCES were separate, OE would still have a need to maintain some internal capability for the provision of methodological support.

(E) *Coordination of OE Data Acquisition Plan.*—NCES coordinates the Data Acquisition Plan, which is an OE effort to review, with the help of program staff, all data collected by OE and to determine the extent of burden placed on respondents to provide information. All data currently collected by bureaus is used in approving applications and monitoring the use of funds. This plan is designed to improve program management by collecting only relevant data, determine points of duplication if they exist, and ultimately relieve some of the demands placed on respondents while also insuring that all data relevant to program needs is made available.

(F) *Commissioner of Education Annual Report on the Education Professions.* The Education Professions Development Act, Section 503(a) and (b), requires the Commissioner to appraise annually the state of education professions in the United States. The Commissioner gives his own views on the state of education professions. NCES provides statistical data and prepares the analysis in draft.

Because of the integral function of the six statistical services listed above to program operation, we believe that a separation would have significant negative implications on our ability to operate programs without undue delay, to perform evaluation and planning of a high quality, to acquire meaningful data and report responsibly to Congress.

Three other statistical activities that would be necessity have to go with NCES because they are activities essential to a sound statistical operation would create especially difficult coordination problems because they are intertwined with other OE activities. These are:

(A) *Handbooks and Manuals Service.*—Handbooks or manuals develop and achieve standard terminology applicable to various areas of education. These are an important component of the NCES services to the Office of Education.

(B) *Higher Education Directory*—OE is mandated by law to maintain a list of accredited institutions of higher education. OE must approve each institution on this list for Federal program eligibility. NCES compiles the list and OE program managers determine that an institution is eligible for Federal assistance programs.

(C) "*Vocational Education Directory.*"—NCES in the Office of Education provides these lists of eligible agencies and institutions for Federal assistance.

Problems of Duplication

The proposed legislation enumerates a number of partially new responsibilities which this independent statistical agency would assume. These new functions may create problems of duplication or overlap activities now undertaken by programs.

At least three major functions currently conducted by USOE would also be in part. NCES responsibilities. Those proposed in S. 7539 are:

"Assist State and local agency in improving and automating their statistical and data collection activities.

"Review and report on educational activities in foreign countries."

Report annually to Congress "those statistics necessary to determine the impact and effectiveness of Federal education programs for purposes of program and legislative planning."

(A) Elementary and Secondary Education Act. Title V. makes funds available, among other purposes, to "provide support or services for the comprehensive and compatible recording, collecting, analyzing, interpreting, storing, retrieving, and reporting of State and local educational data, including the use of automated data systems." The Commissioner of Education approves a State plan program which in part identifies and proposes to meet the statistical needs of a State. Although some limited technical assistance is presently a component of the NCES program, the specific inclusion of this function in the proposed legislation implies that a greater emphasis is desired. If a separate NCES also provided additional assistance to State and local agencies in their data collection effects, extremely close cooperation between NCES and the program would be required in order that duplicative or even differing, assistance would not be provided.

(B) The Office of Education administers eight programs, authorized by Congress, which promote an understanding of foreign languages, area studies, and world affairs. Established in the Fulbright Hays Act and NDEA IV (Foreign Language Centers) these programs collect a variety of information on school systems in foreign countries. In addition, the Division of International Education works closely with UNESCO, as does NCES, to collect and analyze data on educational trends in other countries. Division of International Program professionals analyze and interpret this information. The responsibilities proposed for the separate statistics agency appear to present further possible duplication problems.

(C) While a separate statistical agency could report to Congress on statistics necessary for determining effectiveness of Federal programs, the agency would be unable to do so independently. The determination of program effectiveness is arrived at through the OE evaluation process.

Through evaluation, OE can also better project the types of statistical measures which should be and are used for program and legislative planning. Recognizing the importance of linking evaluation planning and statistics has been one of the reasons NCES is organizationally within the Office of Planning (which also includes legislation, planning, budgeting, and evaluation). The division of this activity between the development and approval of appropriate types of statistics for evaluation and planning *and* reporting to Congress seems unnecessary and probably counter productive.

In conclusion it should also be stated that NCES activities are not tangential to the OE mission. The enabling act establishing the Office of Education set forth the mission of OE to collect: "such statistics and facts as show the condition and progress of education." This central purpose has been reaffirmed in the Education Amedments of 1972. To remove NCES from OE would be a fundamental alteration of the mission of the Office. Such a change should not be made without full consideration of the consequences as well as the law probability of any possible benefits.

Department of Health, Education, and Welfare,
Office of Education,
Washington, D.C., May 28, 1974.

Hon. Carl Perkins,
Committee on Education and Labor,
House of Representatives,
Washington, D.C.

Dear Mr. Chairman: My response to your questions of May 10 is enclosed, supplementing an earlier letter transmitting copies of the staff study on organizational location of the educational statistics function, and of my Data Acquisition Plans for FY 1974 and FY 1975.

I am pleased to explain the new steps taken and planned (Q 1-2) to make educational statistics more widely available and available more promptly than heretofore. We will be glad to incorporate in these innovations provisions for special data needs (within the capacities of the system) which your Committee may identify.

In this connection I am glad also to describe (Q 3-7) cooperative roles of State and local education agencies in helping us to develop and implement effective ways to collect those data which have been determined by the Federal government to be necessary to Federal decision-making. The Common Core of Data (Q 8) is a logical extension of this mutually-beneficial cooperation.

The actual conduct of statistical operations within the National Center for Educational Statistics is addressed in reply to Q 9-10 and parts of 13, in which I describe some of the exigencies under which NCES has perforce carried on its work—and has creditably made real advances—even though it has not been possible to meet the full needs. While the need for new types of data and statistical services have been identified and proposed solutions for filling these needs have been made, the resources required to implement all these proposals have been difficult to come by. In order to meet some of these needs within severe S&E constraints, NCES has used contracting as a method of performing statistical functions. Finally, my point of view on the role of the National Center for Educational Statistics and on the needs for data for policy decision-making on one hand, and the problems of response burden and cost on the other, is presented by my replies to your Question 11 and parts of 13.

In brief, the magnitude of the expressed demand for educational data has increased by an order of magnitude since the beginning of my incumbency, following a similar jump during the preceding two or three years. On the other hand, the resources in both dollars and skilled staff to meet the legitimate data requirements in terms of timeliness, filling data gaps and providing policy oriented data have not been available. The resource allocation judgments within OE and elsewhere in the Executive Branch (under both Republican and Democratic administrations), have been difficult. Requirements for staff and funds to give effect to the substantive educational programs—for which children can't wait—compete with the unquestionably important resource requirements for statistics. At the same time, inflationary pressures on the economy have led those making allocations at the national level, both in Congress and in the Executive, to place ceilings on the share of resources available for education.

The Office of Education is fully sympathetic to the expressed need for policy revelvant data for measuring demand for education and the reach and impact of education programs, for assessing the equity of the distribution of resources and costs of education, and for comprehensive fiscal data on educational programs. It should be recognized, however, that it is unrealistic to expect NCES to mount such large-scale activities with the resources currently on hand.

It is also important for us to develop a mechanism which involves the interests making demands and expressing dissatisfactions in the definition of priorities for data collection and release. (The agency providing the statistics service is in a no-win position if it is judged after the fact as deficient for not providing data which the user didn't anticipate the need.) Concerned users should also recognize that completely new statistical series have a significant unavoidale lead time.

In order to implement and complete the major new data collections required for information for policy analysis it is essential that the entire sequence of Federal resource—allocators is committed to the importance of the demands for educational statistics so forcibly expressed through the questions raised by your Committee.

Sincerely,

JOHN OTTINA.
U.S. Commissioner of Education.

Enclosures:

1a. Availability and Timeliness of Data.

a. *The Commissioner's statement of May 7, 1974 refers to recent steps taken by NCES to improve the availability and timeliness of educational data. These include publication of early estimates of summary data, preliminary computer tapes of surveys, and "EDSTAT." Please describe these activities in detail.*

Publication of early estimates of summary data provides for special dissemination of data on selected questionnaire items, before completion of editing and before all responding units have been heard from. As part of NCES implementation of the early publication program, we have developed the capability of utilizing a computerized file maintenance system (Mark IV) to permit us to make selected tabulations.

Release of preliminary computer tapes of surveys is contemplated at four levels of editing:

Edit Level No. 1: 90% of the data has reached scan/premachine edit and is on tape ("Unedited")

Edit Level No. 2: All presence/absence, add and balance checks completed ("Rough edit")

Edit Level No. 3: Clean data base; i.e., all edit requirements met and historical checks made ("Preliminary Edit")

Edit Level No. 4: Table ready data base; contains imputed data and correction of anomalies ("Final Edit")

Availability of tapes will be publicized, with special emphasis on cautions to be exercised in using data that are not fully edited. These tapes will be accesssble by terminal through "EDSTAT" and also will be sold for the cost of reproduction.

EDSTAT is an online, user interactive (through the use of a computer terminal) large scale information retrieval and statistical reporting system. It maintains a library of approximately 100 million characters of educational data which can be retrieved or processed through user supplied models in an "immediate" time frame. A conceptual design for such a system was underway at NCES, when a subset of postsecondary data files, to be used as the first building block of EDSTAT, was acquired from the National Commission for the Financing of Postsecondary Education (NCFPE) in mid January, 1974.

Since acquisition of the NCFPE files, NCES has expanded the online data base and extensively evaluated its capabilities, with particular emphasis on EDSTAT's ability to provide meaningful information to educational decision or policy makers, and to minimize user costs. The evaluation was completed in April 1974, and the results were two fold:

(1) The continuance and expansion of the system with available and new NCES survey data would enhance its usefulness as well as its utilization, and

(2) The existing communications costs were prohibitive to the average user. For example, users not located near the computer installation in Los Angeles, California would be required to call "long distance" to utilize the service.

The results of the evaluation implied that total operating costs (user and NCES) should be reduced and the service expanded, e.g., more survey information added.

In April, 1974, a purchase order was awarded to a new on-line computer service which provides a network of communications lines enabling users in every large city to access EDSTAT with a local telephone call. Currently NCES is correcting some data errors in the data files supplied by NCFPE, developing accounting routines to obtain a precise count of user queries against NCES and other survey data files, and expanding security precautions to insure that users can access only those data files for which they are authorized. Complete transition to the new EDSTAT system, which also provides the user more retrieval and analytical capabilities, is scheduled for August, 1974.

Concurrent with the transition of a new computing service, NCES will shortly be awarding a contract for the design of a long term EDSTAT system.

to be implemented in approximately two years. Another contract to be awarded before the end of June 1974 provides for the standardization of NCES survey data for user retrieval. Establishment of a standard, uniform format for past, current, and future NCES surveys should enable education policy makers and researchers to access stored information in a more timely manner.

Two other features of the long-term EDSTAT systm are worthy of mention. The system will include data from sources other than the Office of Education, for example, from the Census Bureau and the Bureau of Labor Statistics. In addition, it is envisioned that in two to three years EDSTAT will contain fiscal data on all Federal programs for education.

1-b. *Which data summaries have had early estimates released? How much earlier were they released prior to the full set of data? How long after the "as of" date of the survey were the early releases available? How or by what means was the public notified? Does NCES maintain a mailing list for these publications, or just what?*

Data summaries for which early estimates have been released include (1) Fall Statistics of Public Schools, (2) Higher Education General Information Survey (HEGIS), and (3) Longitudinal Study of the High School Class of 1972. Information on timing, public notification, and mailing lists for each of these sets of early estimates follows:

(1) *Fall Statistics of Public Schools*

Statistics of public schools for	"As of" date	Time from "as of" date to early release (months)	Time from early release to final report (months)
Fall 1971	Oct. 1, 1971	8	7
Fall 1972	Oct. 1, 1972	10	3
Fall 1973	Oct. 1, 1973	8	(1)

(1) Final report not yet published.

Notification: No special public announcement of the advance report was made for 1972. However, press releases were issued in other years.

Mailing Lists: Lists maintained in NCES are used in dissemination of the early estimates. In addition, copies of the Fall 1973 advance report have been made available to the Office of Public Affairs for further dissemination.

(2) *Higher Education General Information Survey*

In the past two years (1972–73 and 1973–74) there have been five early releases of HEGIS data, as follows:

	"As of" date	Time from "as of" date to early release (months)	Time from early release to final report
1972–73:			
Opening fall enrollment	Oct. 1, 1972	2	(1)
Employees	do	4	(1)
Finance	July 1, 1972	8	(1)
1973–74:			
Opening fall enrollment	Oct. 1, 1973	3	(1)
Finance	July 1, 1973	9	(1)

(1) Final report not yet published.

Notification: Early release data are conventionally distributed to every institution of higher education, to every State higher education agency, to every higher education association, to every higher education regional association, and to the media.

Mailing Lists: Standard mailing lists are maintained on computer tape that produce labels for the above lists.

(3) *National Longitudinal Study of the Class of 1972*

A management bulletin was released in March 1974 and a summary report "A Capsule Description of High School Seniors" in April 1974.

	"As of" date	Time from "as of" date to early release (months)	Time from early release to final repor
Management bulletin	Apr. 1, 1972	23	(1)
Summary report	do	24	(1)

[1] Final report not yet published.

Notification: A publication announcement will be sent to recipients noted below.

Mailing List: NCES maintains a list of participating schools and districts and will mail the "Capsule" to them shortly. It also maintains a list of people who have requested publications, and when publications are available mails them directly to them. Finally, NCES has a mailing list for Publication Announcements. These lists are tailored somewhat for the study. In addition, lists of mailing keys maintained by various Branches within NCES are used.

I.c. *For which surveys have computer tapes been released so far? How much sooner were they released before printed publication of the data? How long after the "as of" date of the survey were they released?*

The following table gives information on surveys for which computer tapes have been released as of May 1974, the "as of" date of the survey, the date of release, the date of publication and the intervals between "as of" and tape release dates, and tape release and publication dates. Several points should be made: (1) Tape release dates for the earlier surveys usually followed publication dates; (2) In some cases tapes provide the only source of data for the survey; (3) Until July, 1973, tapes for HEGIS Employee and Finance surveys were withheld to preserve confidentiality of data; (4) Until January, 1973, tapes for the ELSEGIS Public and Non-Public School surveys were withheld at the request of the Committee on Educational Data Systems; (5) Beginning January, 1974, partially edited data tapes are being released on a one year experimental basis; (6) Federal users such as the National Commission on the Financing of Postsecondary Data and Congressional Committees have had access to some tapes prior to general release; (7) Tapes were not widely disseminated until the establishment of a revolving fund permitted us to charge users in February 1972.

NCES COMPUTER TAPES RELEASED

	"As of" date	Tape release date	Publication date	"As of" to release (months)	Release to publication (months)
Higher education general Information Survey (HEGIS) I					
Opening fall enrollment	October 1966	September 1971	May 1968	59	(1)
Earned degrees	June 1966	do	do	63	(1)
Students enrolled for advanced degrees.	November 1966	do	December 1968	58	(1)
Employees	July 1967	July 1973	March 1969	72	(1)
Finance	July 1966	do	August 1969	84	(1)
HEGIS II:					
Opening fall enrollment	October 1967	September 1971	March 1969	47	(1)
Earned degrees	June 1967	do	December 1968	51	(1)
Students enrolled for advanced degrees.	November 1966	do	March 1969	58	(1)
Employees	July 1968	July 1973	December 1970	60	(1)
Libraries	July 1967	September 1971	September 1969	50	(1)
Finance	do	July 1973	October 1969	72	(1)
HEGIS III:					
Opening fall enrollment	October 1968	September 1971	March 1969	35	(1)
Earned degrees	June 1968	August 1971	February 1971	38	(1)
Students enrolled for advanced degrees.	November 1968	November 1971	November 1970	36	(1)
Finance	July 1968	July 1973	June 1971	60	(1)
Employees	September 1968	do	June 1972	58	(1)
Libraries	July 1968	September 1971	April 1969	38	(1)
Physical facilities	September 1968	do	October 1971	36	1
Residence and migration	October 1968	do	May 1970	35	a
Basic student charges	June 1969	do		27	(2)
HEGIS IV:					
Directory	July 1969	April 1973	August 1971	45	(1)
Opening fall enrollment (Basic)	October 1969	September 1971	do	23	(1)
Opening fall enrollment (Supplement)	do	July 1971	do	33	(1)
Earned degrees	June 1969	November 1971	March 1971	29	(1)

NCES COMPUTER TAPES RELEASED—Continued

	"As of" date	Tape release date	Publication date	"As of" to release (months)	Release to publication (months)
HEGIS IV—Continued					
Students enrolled for advanced degrees.	November 1969	August 1971	November 1970	21	(1)
Finance	July 1969	July 1973	June 1971	48	(1)
Physical facilities	do	July 1972	December 1972	36	5
Libraries	do	September 1971	October 1971	26	1
HEGIS V:					
Directory	July 1970	December 1971	March 1971	17	(1)
Opening fall enrollment:					
(Basic)	October 1970	July 1972	October 1971	21	(1)
(Supplement)	do	do	November 1970	21	(1)
Earned degrees	June 1970	June 1972	November 1972	24	5
Students enrolled for advanced degrees.	November 1971	June 1973	November 1971	19	(1)
Finance	July 1970	July 1973	October 1973	36	8
Physical facilities	do	June 1973		35	(2)
Employees	June 1971	July 1973		25	(2)
HEGIS VI:					
Directory	July 1971	December 1971	March 1972	5	3
Official opening fall enrollment	October 1971	July 1972	August 1973	9	13
Earned degrees	June 1971	February 1973	September 1973	20	7
Students enrolled for advanced degrees	November 1971	June 1973	do	19	3
Finance	July 1971	July 1973		24	(3)
Physical Facilities	September 1971	September 1972	May 1973	12	8
Libraries	July 1971	July 1972	May 1972	12	(1)
HEGIS VII:					
Directory	July 1972	November 1972	December 1972	4	1
Finance	do	May 1974		22	(3)
HEGIS VIII DIRECTORY	July 1973	do	September 1973	10	(1)
Elementary and secondary general information survey (ELSEGIS) I:					
School district universe	July 1968	September 1970	April 1969	26	(1)
Public, nonpublic school universe	November 1968	January 1973	November 1973	50	10
A. Staff	October 1968	May 1970	March 1970	19	(1)
B. Finance	July 1968	July 1972	October 1970	48	(1)
ELSEGIS II:					
School district universe	July 1969	July 1970	April 1970	12	(1)
Public school universe	November 1969	January 1973		37	(2)
A. Staff	October 1969	August 1973	October 1971	46	(1)
B. Finance	July 1969	do	do	49	(1)
ELSEGIS III:					
Scholl district universe	July 1970	October 1971	April 1971	15	(1)
A. Staff	October 1970	August 1972	August 1973	22	12
B. Finance	June 1970	October 1972		27	(3)
C. Public school universe	November 1970	January 1973		26	(1)
ELSEGIS IV:					
A. Staff	October 1971	September 1973		23	(3)
B. Finance	July 1971	October 1973		27	(3)
C. School district universe	do	April 1972	July 1972	9	3
D. School universe	November 1971	January 1973		14	(2)
ELSEGIS V school district universe	July 1972	April 1973	November 1973	11	(1)
ELSEGIS VI school district universe	July 1973	February 1974	April 1974	7	2
Adult education participation	May 1969	November 1973	October 1971	54	----
Adult education community organization	April 1972	April 1974		24	(3)
Vocational education characteristics	May 1970	November 1970	December 1970	6	1
Vocational education secondary directory	October 1971	January 1973	May 1973	15	4
Vocational education postsecondary directory.	do	July 1973	June 1973	21	(1)
Public libraries	April 1969	May 1970	May 1970	13	(1)
School staffing survey	April 1970	May 1972	February 1973	25	9
School district fourth count	do	April 1973		36	(2)
School district first count	do	July 1972		27	(2)
Elementary school survey (70):					
Pupil	May 1970	April 1971		11	(1)
Teacher	do	do		11	(2)
Principal	do	do		11	(2)
Superintendent	do	do		11	(2)
Consolidated program information report (70).	August 1970	August 1971		12	(2)
Equality of educational opportunity survey:					
Basic tapes	September 1965	October 1966	July 1966	13	(1)
Summary tapes	do	do		13	(2)
Sample tapes	do	do		13	(2)
Census/ELSEGIS tape	April 1970	August 1973		40	(2)

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[1] Tape released after publication.
[2] No report contemplated.
[3] Report not yet published.

1-c-2. (Computer tape release):

How was the public notified? Is there an NCES mailing list to make these announcements? What are the current costs of the tapes to the public? How many requests from the public has there been so far for these tapes?

The public has not been notified of the availability of the tapes in a formal process, except for discussions with the Committee on Educational Data Systems (CEDS) and other user groups. Separate announcements were sent to a mailing list of over 3,000 educational administrators for: (1) *The School District First Count Tape;* (2) *The School District Fourth Count Tape;* (3) *The Census/ELSEGIS Tape.*

With respect to cost of tapes, there is no charge to other Federal agencies or units. All other users have access to the data at our cost which is passed on to them. On rare occasions the costs have been absorbed by NCES or OE.

The Data Management Center bills NCES for all ADP work. This cost is passed on to the user, with NCES costs (e.g., staff time, packaging, mailing, etc.) added. For straight copy jobs the charge to the user is $78.00 per reel. The great majority of NCES data files will fit on one reel of tape; however when the requester wants more than one data file, each file is put on a separate reel at $78.00 per reel.

For jobs involving extra programming and/or extra data manipulation, a cost estimate is requested from the Data Processing Division. This cost is passed on to the user.

A lending library of the more popular tape files is maintained by NCES for free loan to other Federal Agencies.

The following table shows the number of requests for computerized data during calendar 1973, broken down by (1) educational knowledge area, and (2) by material requested.

Area	Tapes and documentation	Printouts	Mailing labels	Microfiche	Special tabulation	Listing	Documentation only
HEGIS	161	11	27	0	20	16	3
ELSEGIS	184	1	22		1	0	8
EEOS	9					0	2
NLS					1	2	
OCR	1						
School district 4th card	472	1		14	2	0	8
Census-ELSEGIS	22	1		1	0		0
Vocational Technical	11	0	14		0	0	1
Libraries	2	0			0	0	0
Total	862	14	63	15	24	18	22

Note.—A total of at least 1,000 requests is estimated for 1974.

1-d-1. *Which surveys or other collections of data are available through EDSTAT?*

The following data bases are currently included in the EDSTAT online system:

On-line EDSTAT Data Files

(1) Survey of Adult Education in Community Groups 1972.

(2) Survey of participants and non-participants in Adult Education, 1972.

(3) HEGIS VIII 1973-1974: (a) Opening Fall Enrollment, edit level No. 1.

(4) HEGIS VII 1972-1973: (a) Opening Fall Enrollment; (b) Institutional characteristics; (c) Employee (no salary data); (d) Basic student charges; (e) Finance.

(5) HEGIS VI 1971-1972: (a) Opening Fall Enrollment; (b) Institutional characteristics; (c) Basic student charges; (d) Finance; (e) Earned Degrees; (f) Physical Facilities.

(6) HEGIS V 1970-1971: (a) Opening Fall Enrollment; (b) Institutional characteristics; (c) Employee (no salary data); (d) Basic student charges; (e) Physical facilities.

(7) Vocational Education Directory Survey 1970-1971.

(8) Council for financial aid to Education supplied voluntary support survey, 1971-1972.

In addition, certain data files which are used less frequently are available on an off-line basis. However, these data files can be activated and made available to authorized users in less than 12 hours (less than 15 minutes when the new system is available). The off-line data files are as follows:

Off-line EDSTAT Data Files

(1–7) CEEB College Scholarship Service, Student Resource Surveys, 1973–74 for:

(1) University of California Campuses.

(2) California State Colleges and Universities.

(3) California Private Four-Year Colleges and Universities.

(4) California Private Two-Year Colleges.

(5) Pennsylvania Public and Private Colleges and Universities.

(6) Oregon Public and Private Colleges and Universities.

(7) Washington Public and Private Colleges and Universities.

(8) Carniege Commission, Survey of Private, Technical, Business, Specialized and Vocational Schools and Colleges, 1972.

(9) National Commission on the Financing of Postsecondary Education (NCFPE) Survey of Postsecondary Career Schools, 1973.

(10) NCFPE and the Bureau of the Census, Local Government Funding Data, 1966–67, 1971–74.

(11) NCFPE, Federal Program Funding Data, 1971–74.

(12) Illinois State Scholarship Commission, Survey of Financial Aid Recipients, 1970–71.

(13) College Entrance Examination Board, College Locator Institutional File, 1972–73.

(14) State Scholarship Surveys of Financial Aid Recipients, 1971–72, for California, New Jersey, New York, and Pennsylvania.

(15) Council for Financial Aid to Education, Voluntary Support Survey, 1970–71 (private support to institutions by source and use).

1–d–2. *Which surveys are planned for inclusion, and when?*

The data files which will be added to EDSTAT by August, 1974 are listed below. Complete conversion to the new computing system is scheduled to occur between July and August 1974.

Data files to be added by August 1974

File:	*To be added by*
(1) **HEGIS VIII, 1973–74—finance (financial data for 1972–73) Edit level No. 1.**	**June 15, 1974.**
(2) **School district 4th count census tape**	**Do.**
(3) **ELSEGIS III:**	
Staff	**Do.**
Finance	**Do.**
(4) **Office for Civil Rights (OCR) elementary-secondary data 1970**	**Do.**
(5) **OCR higher education data, 1972**	**July 20, 1974.**
(6) **OCR vocational ed data, 1972**	**Aug. 15, 1974.**

1–d–3. *How was the public notified, and by what means?*

USOE has delayed making widespread public announcement of EDSTAT because basic documentation, essential to new users, was not yet available. Such documentation is expected from NCFPE on June 24, 1974 at which time appropriate notification will be disseminated by USOE.

Although USOE decided to defer public notification, NCES's acquisition of the data base has been noted in the *Chronicle of Higher Education*, in *Science* magazine, and at meetings of the American Association for Higher Education. The forthcoming meetings of the Committee on Evaluation and Information Systems of the Council of Chief State School Officers will include a discussion and demonstration of the EDSTAT system.

1–d–4. *How many users of EDSTAT are there outside of the Office of Education? Outside of the Federal government? To what extent are they using it?*

There are 6 organizations outside of the Office of Education (of which 5 are outside of the Federal government) which currently use EDSTAT. Most organizations using EDSTAT have several authorized users. It is estimated that the potential number of EDSTAT users could exceed 50 in one year and 200 in 3 years.

Outside OE, utilization of EDSTAT can not be determined as users are billed directly for their use. NCES is billed for the on-line data storage. A telephone survey of some users found that some data files are accessed by users daily while others are used less frequently.

1-d-5. *What are the costs of using EDSTAT?*

Current system

(1) NCES cost is $1,500 per month for on-line and off-line data storage.

(2) User (NCES, government and non-government) cost depends upon usage and the complexity of the queries. The preparation of a typical simple statistical report would cost about $7.50 plus the cost of a telephone call to Los Angeles. Note that federal users have access to FTS.

New system with expanded data base

(1) NCES cost is $3,000 per month for on-line and off-line storage.

(2) Users costs. Approximately $6.00 for the average query. No telephone charges would occur for users in large cities where EDSTAT can be accessed by a local call.

1-e-1. *At the hearings of May 7, the Commissioner testified that NCES received more than 11,000 requests for data each year and that almost all of the requests were answered. Can you provide us a brief summary of the kinds of requests made (e.g., for computer printouts, publications, single tables, single numbers) and the kinds of people making the requests (e.g., Federal government, State and local government, universities).*

The following is an estimate of the number of requests to which the National Center for Educational Statistics responded last year, by kind of request:

Kind or request:	*Number*
1 or more statistics, transmitted orally	3,500
Statistical publications	2,000
Combination of statistical publicaitons and oral transmission of data	1,500
Letters providing statistical information	1,500
Combination of letters and statistical publications	1,000
Special "ad hoc" tabulations	500
Tabulations prepared in response to recurring questions	500
Combinations other than those shown above	500

The above tabulation excludes requests for computerized data, which have already been summarized in question 1–c.

The number of requests coming from varions sources was as follows:

Source of request:	*Number*
Educational institutions and organizations	3,300
Business and miscellaneous organizations (includes manufacturers of school supplies and equipment, market analysts, management consultants, trade associations, labor unions, veterans' groups, etc.)	2,750
Government agencies (about three-fourths of these are from Federal Government agencies; the remainder are from State and local government and international organizations like UNESCO AND OECD)	2,200
Members of Congress and congressional committees	1,100
The general public (requests from individuals rather than institutions and organizations)	1,100
The communications media	550

1-e-2. *What were the charges for these services, if any. What kinds of requests could not be answered by NCES?*

There is no charge for these services except for requests for computer tapes, for which the charge is $78 per reel.

Three main kinds of requests which could not be answered by NCES are:

(1) Demographic characteristics of individuals, such as age, race, and socioeconomic status of students, graduates, and instructional staff. Unavailability of such data stems from the fact that NCES surveys, typically, are institution-based, rather than "population" surveys.

(2) Ratings or rankings of schools and school systems.

To an inquiry of this kind we have to reply that we do *not* rate or rank schools or school systems. We do collect basic data that enable people to compare different jurisdictions on such indirect measures of educational quality as expenditure per pupil, average salary of classroom teachers, and number of pupils per teacher. Our clientele frequently use these kinds of statistics in the absence of more definitive "rankings."

(3) A third type of inquiry for which we are unable to provide data is the request for detailed information at the local level for the current year. We do have current information on public school systems in each State and in the 20 largest cities in the country.

2. Quick-Survey Capability.

At the hearings of May 7, the Commissioner referred to the "quick-survey capability" of NCES. Please provide a description of this capability. How often is it used? Who uses it? How quick is it? What kinds of questions is it capable of answering?

Answer: The proposed "Fast Response Survey", capability, which we have not heretofore been able to establish, will be a means for securing nation-wide representative information when needed, on short notice. We expect to recruit a small group of interviewers, widely dispersed over the country, to train them to carry out questionnaire interviews in education, and to establish standardized procedures for recording data and for communication in both directions by telephone and/or computer. The activity will be an arm of NCES; NCES staff will prepare the questions to be asked in order to contribute, together with other data being collected, to current information needs for policy. Each inquiry will focus on a small number of questions (postcard size), to permit rapid processing and availability to the policy-maker in a few days—as are the public opinion polls.

The frequency of use can't be foreseen. We plan to start very modestly planning for only two surveys in the first year, and possibly one each quarter in the second year. If successful in providing important topical data important to policy officials, the utilization may increase.

We anticipate that the Assistant Secretary for Education, the Commissioner, and Deputy Commissioners will be the most active users, but the capability would in principle be available to other Executive Branch officials and Congressional Committees concerned about education.

The expectation is that data can be collected, summarized, and reported within four weeks of the beginning of interviewing. The preparation of the survey, from deciding on a topic to be investigated, will require typically two to six weeks, depending in part on our success in arranging for expedited review for clearance under the Federal Reports Act and in securing concurrence by the Chief State School Officer in such direct collection from elementary-secondary school systems. A small scale fast collection of data was conducted recently using telephone from Washington, to obtain indications from nine important teacher training institutions on the responses of such institutions to the teacher surplus. In ten calendar days, an indicative assessment based on six questions was completed. The panel of respondents was not an adequate sample for estimates, so this does not illustrate a "Fast Response Survey", but it does confirm the feasibility of carrying through necessary operational steps on a highly responsive time scale.

The Fast Response Survey is suited to factual questions, numerical or categorical, and to summary questions of attitude or preference. It is not suited to discriminating among fine distinctions in either respect, nor to exploring relationships among characteristics. In many policy areas, the gross impact of a new development, (a price rise, e.g.) may be important to assess. Similarly, the broad divisions of public sentiment on new issues are of legitimate policy interest, rather than fine distinctions.

3-1. *At the hearings of May 7, the Commissioner referred to "formal agreements of cooperation" with the States concerning the collection of educational data. Can you provide copies of some of these agreements?*

As OE data requirements on State and Local Education Agencies (SEAs and LEAs) incidental to education program operations and evaluations mandated by Congress grew rapidly in the late sixties, OE initiated and augmented a consultation arrangement with the SEAs, through the Council of Chief State School Officers (CCSSO), beginning in 1968. The Council had created a Committee on Educational Data Systems (CEDS) in late 1962, which was called on by NCES for advisory comment on NCES data collection proposals. The role of CEDS was to help NCES determine how to collect useful data in light of their practical detailed knowledge of school data systems, and to suggest alternatives and even to question the need for specific data which they regarded as difficult to collect on a valid basis.

In 1970, the separate consultations between OE offices and the CCSSO Special Committee on Program Evaluation on the one hand, and between NCES and CCSSO's CEDS on the other, became unduly cumbersome. Early in 1971, the Commissioner coordinated OE concerns about data by establishing the Data Acquisition Task Force, chaired by the Assistant Commissioner for Educational Statistics. He charged that OE-wide Task Force with preparation of a coordinated Annual Data Acquisition Plan. (See reply to Question 7). CCSSO then created a single new Committee on Educational Information Systems (CEIS) which has as one of its functions consultation with OE on the entire data acquisition plan and process. The planning cycle has been arranged to enable OE to take maximum benefit of the assistance of the State representatives to CEIS. The planning cycle was agreed to at a meeting of the Coordinating Committee on Information and Evaluation (Joint CCSSO and OE Committee) at Atlantic City, February 11, 1972.

Formal agreements with the States include:

A. **Agreement on 9-month lead time—first with CEDS, renewed with CEIS (6/73).**

B. Joint funding of data liaison representatives.

C. Resolution on Annual Data Plan.

D. Resolution on attempts to bypass State Education Agencies 6/73.

E. Resolution on Division of Education Data Collection Centers 6/73.

F. Resolution on data standards 6/73.

G. Resolution on data needs of regional offices 10/73.

H. Resolution on exceptions to FY 75 Annual Data Plan 2/74.

I. Contracts for delivery of data in accordance with time and quality standards—CPIR, ELSEGIS, etc.

Copies of the above agreements are enclosed.

The National Center for Educational Statistics has entered into cost-sharing contracts with the State Education Agencies (Ref. to I above) in order to lift some of the financial burden of Federal reporting from the States.

3–1a. Resolution of 9-Months Leadtime on Data Forms

RESOLUTIONS TO THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS FROM ITS COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS

Whereas, the Council of Chief State School Officers and the individual chiefs desire to reduce and coordinate the data requirements at the state education agencies and local education agencies level and,

Whereas, state education agencies through their data collection plans desire to provide the Department of Health, Education, and Welfare requested data without the imposition of additional forms on local education agencies and,

Whereas, the state education agency requires planning time to develop their data collection plans,

Whereas, on occasion, state education agencies have been required to provide data expost facto from a previous fiscal year in response to a request for follow-up during fiscal years for which the state education agencies have had no advance indication that they would be required to maintain, record, and provide the data, and

Whereas, state education agencies have been required to provide follow-up data on a previous fiscal year which had not been required to be maintained, stored, and reworded during that previous period: Therefore, be it respectively

Resolved, That; Section 1. The Council of Chief State School Officers requests that the Department of Health, Education, and Welfare make every effort to comply with a nine-months advance notice prior to data collection.

3–1b. Resolution on Data Liaison Project

Whereas, the Data Liaison Project was funded and began functioning on January 15, 1973, and

Whereas, as fiscal support for the project was 49% from the Office of Education and 51% by special assessment by states, and

Whereas, this assessment was $750 per state for the first year, and $300 per state for the last six months (to June 30, 1973), and

Whereas, the Data Liaison Project was staffed with one senior professional person, and one junior professional person, and

Whereas, the states' and Chief State School Officers' interest in federal data acquisition activities have been represented more adequately at the working level, and

Whereas, survey of Chief State Officers and CEIS State Coordinators verify that the project has been of great benefit, and

Whereas, it has been difficult to secure the services of good professional people when funding is uncertain: Now, Therefore be it respectfully

Resolved, That, 1. The Council of Chief State School Officers include funds in their FY-75 budget to provide fiscal support for the data Liaison Project as a permanent function of the Council of Chief State School Officers.

2. Such fiscal support would provide for the senior professional position, junior professional position, secretarial and other supportive services.

3-1b. MEMORANDUM OF UNDERSTANDING, NOVEMBER 20, 1972

1. *Purpose of Agreement.*—This agreement governs the conditions of work of two professional-level State education agency personnel in the U.S. Office of Education for purposes of liaison in matters involving Federal/State data collection and information systems.

2. *Support and Responsibility.*—USOE and CCSSO respectively will provide 49 and 51 percent of the cost of salaries and benefits of the two employees, the total cost of which to USOE is not to exceed $22,050 per annum. The employees are to be released or on leave without pay from their respective agencies, will become temporary employees of CSSO on detail to the U.S. Office of Education, and will be housed at the U.S. Office of Education's National Center for Educational Statistics. The two staff members will be employed by CCSSO with the prior review and agreement of USOE. They will be expected to observe the working hours and regulations governing USOE staff, and will work closely with and under the general cognizance of the NCES Deputy Assistant Commissioner for Data Acquisition and Utiiization.

3. *Duties.*—The liaison staff will be expected to provide an open and continuous means of communication between the States and USOE with respect to information systems and data acquisition and utilization. They will work through the Committee on Evaluation and Information Systems (CEIS), a committee of CCSSO, in performing liaison with the States, and will work through the Deputy Assistant Commissioner for Data Acquisition and Utilization in establishing regular means of communicating with USOE Bureaus and offices.

The liaison staff will be expected to keep CCSSO fully informed, through periodic meetings with the CEIS committee, regarding Federal plans and activities involving educational information requests directed to State and local agencies, and will keep USOE informed regarding State and local data requirements. The liaison staff will assist USOE and CCSSO in making arrangements for the review of the annual USOE data acquisition plan, and in the conduct of such other matters jointly agreed upon as necessary for the effective creation and funtioning of a Federal/State/local integrated data system.

4. *Support.*—USOE will provide office space and such clerical, telephone, duplicating, travel funds, and other support services as may be necessary, within the operating limits established by the total NCES budget.

BYRON HANSFORD,
DOROTHY M. GILFORD.

3-1c. RESOLUTION ON ANNUAL DATA PLAN

RESOLUTION TO THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS FROM ITS COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS

Whereas, the USOE Annual Data Collection Plan is of great importance to the Council of Chief State School Officers and the individual chief state school officers and,

Whereas, the Council of Chief State School Officers has assigned the Committee on Evaluation and Information Systems the responsibility of reviewing the Annaul Data Collection plan and making recommendations to the Special Coordinating Committee for Education Information and, Whereas, maximum input in the review process by each state is desirable and,

Whereas, CEIS has not had sufficient time to consider all of its duties on a timely basis due to late reception of data collection forms: Therefore, be it respectively

Resolved, That: Section 1. The Data Acquisition Task Force be requested to furnish the Council of Chief State School Officers (via procedures to be developed with SCR/reprducable copy of each form and related instructions) along with the form cover sheet of those forms to be included in the Annual Data Acquisition Plan, and

Section 2. These forms should be provided on a timely basis, and

Section 3. These forms be duplicated and made available to each state CEIS coordinator or to members of the Committee on Evaluation and Information Systems designated for that purpose.

3-1d. Resolution on Attempt to By-Pass State Education Agencies

RESOLUTION TO THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS FROM ITS COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS

Whereas, the Equal Employment Opportunity Commission, the Office of Civil Rights and the Office of Education has undertaken to develop an interagency survey of educational staffing conditions, and

Whereas, such survey has been proposed to bypass state education agencies, and be completed by local school districts and local schools, and

Whereas, such survey has not been coordinated with any state or local education agencies to the extent that an unreasonable reporting burden will be placed on the state education agencies and local education agencies during FY74, and

Whereas, state and local agencies have not been supplied with any guidelines specifying how data obtained through this survey will be used in determining compliance with Title VII of the Civil Rights Act, 1964, and

Whereas, the states have the same need for a data base as the agencies of the Federal Government: Now therefore, be it respectively

Resolved, That: Section 1. The Council of Chief State School Officers encourages the Assistant Secretary to continue in his efforts to work with other Federal offices to include their data collection efforts with the Annual Data Acquisition Plan of the Office of Education.

Section 2. And that the Council of Chief State School Officers opposes any efforts on the part of any federal agency to bypass state education agencies in the collection of education data

Section 3. That the Council of Chief State School Officers be represented with as many members, or their representatives, as possible at the EEOC hearings June 27 in Hearing Room 1129, 1800 G Street, N.W., Washington, D.C.

3-1e. Resolution on HEW/Division of Education Data Collection Centers

RESOLUTION TO THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS FROM ITS COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS

Whereas, the National Center for Educational Statistics has been designated as the Statistical Center for the Office of Education, and

Whereas, the National Institute of Education is located outside the U.S. Office of Eucation, and

Whereas, the Council of Chief State School Officers established its Committee on Evaluation and Information Systems "to provide the CCSSO with a *single* coordinated effort in meeting present and emerging concerns and in formulating recommendations in the area of federal/State/local educational systems, including but not limited to research, evaluation, and management information," and

Whereas, the Assistant Secretary of Education for the HEW/Division of Education is responsible for the activities of both the Office of Education and the National Institute of Education, and is currently engaged in planning the reorganization of the Division of Education: Now, therefore be it respectively

Resolved, That: Section 1. The Council of Chief State School Officers make known to the Assistant Secretary for Education the collective State's concern for having *one* statistical center to meet the needs of the Office of Education and the National Institute of Education.

Section 2. The Council of Chief State School officers make known its intention that its Committee on Evaluation and Information Systems should be the single liaison for data collection activities of all component parts of the HEW/Division of Education.

Section 3. The Council of Chief State School Officers submit their recommendation to the Assistant Secretary for Education at the earliest possible date in the event that such recommendations may influence the ongoing planning for the reorganization of the HEW/Division of Education.

3-1f. Resolution on Data Standards

RESOLUTION TO THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS FROM ITS COMMITTEE ON EVALUATION AND INFORMATION SYSTEMS:

Whereas, state educational agencies are legally constituted and have the responsibility for education within its boundaries, and

Whereas, state education agencies desire to assist and support local educational agencies to establish an educational management information system, and

Whereas, state education agencies desire to coordinate the collection and use of information between local, state, and federal agencies, and

Whereas, the Council of Chief State School Officers established the Committee for Evaluation and Information Systems to provide the chief state school officers with a single coordinated effort for compatible data with standard terminology and data definitions: Therefore, be it respectively

Resolved, that: Section 1. The Council of Chief State School Officers recommends that each chief state school officer seek to establish standard terminology and data item definitions by adopting and implementing, to the extent possible under existing regulation, the revised USOE Handbook series as rapidly as resources permit.

3-1g. Resolution on Data Needs of Regional Offices

Whereas, the Council of Chief State Officers has had deep concerns concerning growing data burdens, duplication of requests and lack of coordination in data collection activities at the federal level, and

Whereas, the Office of Education has established the Task Force for Planning Acquisition of Data to provide a means of internal coordinating data requests and utilization, and

Whereas, the Council of Chief State School Officers has designated its Committee on Evaluation and Information Systems (CEIS) to provide the Council with a single coordinated effort in meeting present and emerging concerns and in formulating recommendations in the area of federal/state/local educational systems including but not limited to research, evaluation, and management information, and

Whereas, the Office of Education's Task Force for Planning Acquisition of Data and CEIS are working jointly to prevent duplication of data requests, and maximizing utilization of existing data bases: Now therefore, be it respectively

Resolved, That: Section 1. Regional Offices of the Office of Education comply with the existing mechanism for OE/State coordination of data requests, namely the Office of Education Task Force for Planning Acquisition of Data's Annual Data Collection Plan, and the CEIS review of that Plan.

3-1h. Resolution on Exceptions to FY-75 Annual Data Plan

Whereas, the Office of Education and the Council of Chief State School Officers have jointly agreed to the compilation and analysis of an Annual Data Acquisition Plan as a technique of coordinating USOE data collection activities, and;

Whereas, the Council has delegated the detail review of this Plan to its Committee on Evaluation and Information Systems, (CEIS), and;

Whereas, the Preliminary Review of this plan has been completed by the
Annual Data Plan Review Committee: Therefore, be it respectively
Resolved, That: 1. All forms except those included in Attachment *A* of Interim Report of the Annual Data Plan be accepted for FY–75. Forms included
on the list should be submitted through the appropriate CEIS subcommittees
and the USOE Committee on Charges after additional study and modification
for final decision on acceptance or denial as part of the plan. USOE/NIE
should remain receptive to suggestions for form modifications on all those
forms that have not been finalized as of this date.

3–1i. Special Provisions

CONTENTS OF CONTRACT

This contract consists of:

1. Cover page HEW–554.
2. Special provisions HEW–556:
    - Article I, Scope of Work.
    - Article II, Technical Reports.
    - Article III, Delivery Schedule.
    - Article IV, Changes in Key Personnel.
    - Article V, Project Officer.
    - Article VI, Acknowledgement & Disclaimer in Publication.
    - Article VII, Audio-Visual Production.
    - Article VIII, Clearance of Forms.
    - Article IX, Compensation.
    - Article X, Use of Consultants.
    - Article XI, Payment Schedule.
    - Article XII, Related Documents.
3. General provisions, HEW form 5211 (revised April 1969) negotiated.

Article I—Scope of Work

The Contractor shall perform the work and/or services as described in the
Contractor's Proposal incorporated herein by reference (See Article XII—Re-
~~lated Documents~~).

Article II—Technical Reports

Final Report.—Fifteen (15) copies of the final report shall be submitted to
the Project Officer within 30 days after submission of last Part due and
agreed to under Article III below.

Article III—Delivery Schedules

The Contractor shall deliver the following materials to the Contracting
Officer on the dates indicated as agreed to in Attachment A, I. Performance
Agreement.

Item and Date:

Part A–1. December 13, 1974.
Part A–2. April 18, 1975.
Part A–3. December 13, 1974.
Part A–4. December 13, 1974.

Article IV—Changes in Key Personnel

The Project Director, ------------------, is considered to be essential to
the work being performed hereunder. Prior to diverting the Project Director to
other programs, the Contractor shall notify the Contracting Officer reasonably
in advance and shall submit justification (including proposed substitutions) in
sufficient detail to permit evaluation of the impact on the Program. No diver-
sion shall be made by the Contractor without the written consent of the Con-
tracting Officer: *Provided*, that the Contracting Officer may ratify in writing
such diversion and such ratification shall constitute the consent of the Contract-
ing Officer required by this article.

Article V—Project Officer

The Project Officer responsible for monitoring the technical activities under
this contract is Logan C. Osterndorf. The Project Officer is not authorised to

make any commitments or authorize any changes which affect the contract price, terms or conditions. Any such proposed changes shall be referred to the Contracting Officer for appropriate action.

Article VI—Acknowledgement and Disclaimer in Publications

a. Any publication or presentation resulting from or primarily related to the project being performed hereunder shall contain the following acknowledgement:

"The work presented or reported herein was performed pursuant to a Contract from the U.S. Office of Education, Department of Health, Education and Welfare. However, the opinions expressed herein do not necessarily reflect the position or policy of the U.S. Office of Education, and no official endorsement by the U.S. Office of Education shall be inferred."

b. Materials produced as a result of this contract may be published without prior review by the Commissioner, provided, that 15 copies of such materials shall be furnished to the Contracting Officer and no such materials may be published for sale without the prior approval of the Contracting Officer. Such approval shall be subject to such requirements as the Commissioner deems appropriate.

Article VII—Audio-Visual Production

Prior written approval must be obtained from the Contracting Officer for the use of any funds, including subcontracts, for the planning and/or production of audio-visual materials (i.e. motion picture films, video-tapes, film strips, slide sets, tape recordings, exhibits, or combinations thereof) regardless of intended use.

Article VIII—Clearance of Forms

In the event the work performed involves the collection of identical information from ten or more individuals or organizations, other than Federal employees or agencies, the Contractor should submit to the Contracting Officer six copies of all questionnaire forms and survey plans for transmittal to the Office of Management and Budget for approval prior to their use, in accordance with the Federal Reports Act of 1942. (Reference Article 1., Scope of Work, Attachment A, Section IV (a)).

Article IX—Compensation

If a staff member is involved simultaneously in two or more projects supported by funds from the Federal Government, he may not be compensated for more than a total of one-hundred percent (100%) time from such Government funds for all projects during any given period of time. The Contractor shall not use any contract funds or funds from other sources to pay a fee to, or travel expenses of, employees of the Office of Education for lectures, attending program functions, or other activities in connection with the contract.

Article X—Use of Consultants

a. The hiring and payments to consultants shall be in accordance with applicable State and local laws and regulations and contractor policies. However, for the use, and payment to, consultants whose rate will exceed $100.00 per day, prior written approval for use of such consultants must be obtained from the Contracting Officer.

b. The Contractor must maintain a written report for the files on the results of all consultations charged to this contract. This report must include, as a minimum: (1) the consultant's name, dates, hours, and amount charged to the contract; (2) the names of the contractor staff to whom the services are provided; and (3) the results of the subject matter of the consultations.

Article XI—Payment Schedule

a. The Government agrees to pay the Contractor for each of the parts of ELSEGIS VII which meet the Government's specifications set forth in Attachment A, Scope of Work and Performance Requirements: Part A-1: $150.00; Part A-2: $600.00; Part A-3: $100.00; Part A-4: $200.00.

b. The Government further agrees to pay the sum of $_______ to cover the cost of travel, meal, and lodging expense of the project director or other staff member the Contractor may send to the workshop as described in Attachment A, Paragraph II, Task 1.

c. Sixty percent of payment due for each part shall be rendered upon receipt and acceptance of the completed reports for that part and the Contractor's invoice. Balance of payment due shall be rendered when the data reported have passed the edits and met the requirements set forth in Attachment A. Payment for travel expense as provided in (b) above shall be rendered upon receipt of the Contractor's invoice for same.

Article XII—Related Documents

Attachment A—Scope of work and Performance Requirements.
Attachment B—ELSEGIS VII Survey Forms and Instructions.

[Note: Attachment B retained in subcommittee files.]

ATTACHMENT A—SCOPE OF WORK AND PERFORMANCE REQUIREMENTS

I. PERFORMANCE AGREEMENT

The Contractor agrees to furnish the data requested on the draft survey forms enclosed as Attachment B hereto for each of the parts of ELSEGIS VII he has checked below:

Part A-1: State Fall report on Staff and Pupils.
Part A-2: State Elementary and Secondary School Statistics.
Part A-3: State Fall Estimates of Expenditures and Salary Data for Public Schools.
Part A-4: State Fall Report on Public Schoolhousing.

II. WORK STATEMENT

Task 1—Survey Management Workshop

The National Center for Educational Statistics will conduct a survey management workshop to last not longer than four days at a time and place to be announced at least one month in advance (probably during April or May, 1974). Purpose of the workshop will be to discuss in detail data collection and editing requirements and data item definitions with project directors. The Contractor will be expected to send his project director or a senior staff member whom he may designate in lieu of the project director to this workshop. The travel expense, including meals and lodgings, for this person may be charged against this contract as provided in ARTICLE XI. The Contractor may, however, send additional personnel at his own expense.

Task 2—Data Collection

Data requirements are contained in Exhibit 1 attached hereto. The Contractor may collect the required data in any manner he considers practical and economical. The Government will furnish upon request printed survey forms in quantities sufficient for each required report at no cost to the Contractor. The Contractor may use these forms to collect the required data from local education agencies in his State, or he may extract the data from other sources, provided that such sources contain the required data and conform to the ELSEGIS data definitions; further provided that the contractor will furnish a copy of each of the source documents and data definitions used thereon for NCES prior review and approval.

Task 3—Data Preparation

ELSEGIS data may be transmitted on either the printed survey forms furnished by the Government, or on a form facsimile computer listing. Data entries may be either handwritten or typed (or computer printed on form facsimiles). If a computer printed form facsimile is used, data item identification numbers as they appear on the survey form must be preprinted above or alongside the data entry to which the item number applies.

Data may be transmitted in machine-readable media with the prior approval of the Project Officer under a specific agreement that such machine-readable records meet the Government's specifications and that any remedial action necessary to meet these specifications is guaranteed by the Contractor.

Task 4—Editing

Specific editing requirements will be provided on or before survey mail out time. These requirements will be incorporated into a machine edit program to be written by the Government. Data furnished by the Contractor will be subjected to a machine edit by the Government to insure that: a. reported totals equal the computer sum of the addends; b. certain key items contain values greater than zero; and, c. certain computer ratios lie within prescribed tolerances.

Each record failing the edit will be displayed in a card or form image format on a listing and returned to the Contractor for necessary corrective action. It is the Contractor's responsibility to enter the necessary data field corrections and/or identify any valid exceptions to any key item or tolerance check. When the Contractor has completed corrective action, the corrected listing must be returned to the Project Officer.

The machine edit programs and documentation will be made available to any Contractor seeking to edit the data prior to transmittal, however, the Contractor is not required to perform machine edit.

III. MATERIALS AND SERVICES TO BE PROVIDED BY THE CONTRACTOR

The Contractor shall furnish all personnel, printed and other materials, and such services as may be necessary to provide the required data. If the Contractor sends the data on magnetic tape(s) and requests the return of his tape(s), the Government guarantees the return of such tape(s)in good condition or tapes of equivalent quality within 60 days of receipt.

IV. MATERIALS AND SERVICES TO BE PROVIDED BY THE GOVERNMENT

The Government will furnish, as requested:

a. An adequate supply of printed survey forms, pre-addressed for each respondent. The ELSEGIS VII draft forms included in Attachment B have not been approved by the Office of Management and Budget. If any changes are made to these draft forms by the Office of Management and Budget in the clearance process, the Contractor will be immediately notified thereof. If such changes alter the scope of work specified in this contract, provision will be made for negotiation to adjust the reimbursement schedule.

b. A listing and or card file of identification numbers for respondents included in the samples or universes.

c. A supply of postage free return addressed labels.

d. Such personnel as may be needed to monitor this contract and answer technical questions about performance requirements.

V. RESPONSE RATE REQUIREMENTS

a. The Contractor must secure data for at least ninety (90) percent of the local educational agencies to complete reports Part A-1; A-2a and b; and A-4, and one hundred (100) percent for A-2c.

b. A response is required for each data item on each part of ELSEGIS VII. If a data item is not available in the Contractor's files, but a reliable basis for estimation exists, the item may be estimated, provided that each estimate is identified as such. If the Contractor estimates any of the variables, he must furnish the Project Officer with a written description of the estimation process. It is further provided that estimates for data items in Part A-2c are not acceptable.

VI. FINAL REPORT

Upon completion of this contract the Contractor shall submit a final report (in 15 copies) which shall contain:

a. A description of the procedures employed to gather and prepare the data, including copies of any survey forms other than those furnished by the Government that were used.

b. A description of the basis for estimating any of the data items if any estimates were furnished.

c. A description of problems encountered in data collection and preparation, and how such problems were solved.

d. A general evaluation of the project.

BEST COPY AVAILABLE

Department of Health, Education, and Welfare

Contract No.

Date: May 10, 1971

FIXED PRICE CONTRACT

CONTRACTOR

PLACE(S) OF PERFORMANCE

ADDRESS (No., Street, City, State, Zip Code)

PERIOD OF CONTRACT

From: 6/1/71 To: 6/30/72

CHECKS TO BE MADE PAYABLE TO (Name and complete address)

Same as above.

PURPOSE:

Vocational Education Secondary and Postsecondary Directory Project

PRICE

In accordance with attachment D.

APPROPRIATION

7510271

ALLOTMENT

2007049

AUTHORITY

U.S.C. 252(c)(15) and P.L. 89-10, Title IV

This contract is entered into as of the date shown on page one, between the United States of America (hereinafter referred to as the "Government"), represented by the Contracting Officer executing this contract, and the named Contractor.

Witnesseth That:

Whereas, the Contractor's organization is specifically qualified and equipped to perform the work and/or services hereinafter described in the manner contemplated herein; and

Whereas, it has been determined that it is in the best interest of the Government to enter into such contract and to compensate the Contractor for the work and/or services performed under this contract as set forth herein; Now, therefore, it is mutually agreed as follows:

1. The contractor will send the project coordinator or a senior staff member to a survey management workshop to be conducted by the Government at a

time and place to be announced by the Government. (Locations of these workshops are shown on Attachment A).

2. The contractor will provide the data requested on the following types of institutions which offer vocational education: a. public secondary schools; b. private secondary schools; c. public postsecondary schools; d. private postsecondary schools.

3. No data shall be provided by the contractor on public and private postsecondary institutions which are colleges and universities and included in the Higher Education General Information Survey (HEGIS).

SPECIAL PROVISIONS

Article I. Attachments

The following attachments are included in this contract:

Attachment A—List of regional survey management workshops.

Attachment B—Performance requirements for the following: 1. Work statement; 2. Materials and Services to be Provided by the Contractor; 3. Materials and Services to be Provided by the Government; 4. Survey Management Workshops; 5. Final Report; 6. Release of Data.

Attachment C—Sample Survey Instruments and General Instructions.

Attachment D—Cost Sharing Estimates.

Article II. Reimbursement for Services Performed

A. For services rendered, the Government agrees to reimburse the Contractor according to the following schedule:

1. Round trip air fare, coach class, or automobile mileage at the rate of $0.09 per mile (total not to exceed air fare) plus per diem at the rate of $25.00 per day for one staff member to attend the survey management workshop to be conducted by the Government as indicated in Attachments A and B.

2. $2.00 for each completed Public Secondary School Form which meets the Government's specifications.

3. $4.00 for each completed Private Secondary School Form which meets the Government's specifications.

4. $2.00 for each completed Public Postsecondary School Form which meets the Government's specifications.

5. $5.00 for each completed Private Postsecondary School Form which meets the Government's specifications.

B. Response Rate Requirements:

1. The contractor should make every effort to provide information on all public and private secondary and postsecondary institutions offering vocational education.

C. Payment Schedule:

Sixty percent (60 percent of the payment due shall be rendered upon receipt of the completed tapes and the Contractor's invoice. Balance of payment shall be rendered when the data reported have passed the edits as provided hereinafter and have been found acceptable by the Government. Payment for travel expenses incurred by the Contractor's staff member attending the survey management workshop may be rendered upon receipt of the Contractor's invoice for same.

Article III. Dates for Project

Preliminary instructions and forms accompany this contract. The Government shall furnish the Contractor final instructions, forms, and other materials by September 1, 1970. Data and editing requirements will be provided by June 30, 1971.

The Contractor shall return the completed secondary and postsecondary data by December 31, 1971.

Article IV, Project Director

The Contractor shall name a project director who shall have responsibility for managing the project. The project director shall serve as the Contractor's contact with the Government's project officer named in Article V. The Contractor shall furnish a brief resume of the project director which describes his educational background, recent previous positions, and present position. The project director may serve less than full-time on the project.

____
Name of project director

____
Official title

Article V, Project Officer

The Project Officer for administering this contract on behalf of the Government is: Robert Calvert, Jr., Chief, Adult and Vocational Education Surveys Branch; National Center for Educational Statistics; U.S. Office of Education, Telephone: (202) 962-6791.

The Project Officer is not authorized to make any commitments or authorize any changes which affect the contract price, terms or conditions; any such changes shall be referred to the Contracting Officer for action.

Article VI, Related Documents

The following documents are hereby made part of this contract by reference:

Attachment A—List of Regional survey management workshops.
Attachment B—Performance Requirements.
Attachment C—Sample Survey instruments and general instructions.
Attachment D—Cost Sharing Estimates.

Article VII, Clearance of Forms

The survey forms attached to this contract may not have yet been approved by the Office of Management and Budget. If any changes are made to these draft forms by the Office of Management and Budget in the clearance process, the contractor will be immediately notified thereof. If such changes alter the scope of work specified in this contract, provision will be made for negotiation to adjust the reimbursement schedule.

Article VIII, General Provisions

The attached General Provisions, Form OE HEW 313, are hereby made a part of this contract.

Article IX, Alterations

The following alterations were made to the General Provisions prior to the signing of this contract.

(a) Clause 6, Equal Opportunity is deleted in its entirety and superseded by the attached Form HEW-386 (Rev. 5/66), EQUAL EMPLOYMENT OPPORTUNITY.

(b) Clause 20, Patent Rights, is deleted in its entirety and superseded by the attached PATENT RIGHTS clause.

(c) Certification of NONSEGREGATED FACILITIES is attached and made a part of this contract.

In Witness Whereof, The Contracting Officer and the Contractor have executed this contract as of the day and year first above written.

THE UNITED STATES OF AMERICA,
By ______________________________
Contracting Officer, U.S. Office of Education

____
(Name of Contractor)
By ______________________________
Title

ATTACHMENT A—List of Regional Survey Management Workshops

VOCATIONAL EDUCATION DIRECTORY PROJECT

Washington, D.C.:
- Delaware
- Maryland
- New Jersey
- Ohio
- Pennsylvania
- West Virginia
- District of Columbia
- Virginia

Atlanta, Ga.:
- Alabama
- Arkansas
- Florida
- Georgia
- Louisiana
- Mississippi
- North Carolina
- South Carolina
- Tennessee
- Texas
- Puerto Rico

Boston, Mass.:
- Connecticut
- Maine
- Massachusetts
- New Hampshire
- New York
- Rhode Island
- Vermont

Chicago, Ill.:
- Illinois
- Indiana
- Iowa
- Kentucky
- Michigan
- Minnesota
- Missouri
- Wisconsin

Denver, Colo.:
- Arizona
- Colorado
- Kansas
- Montana
- Nebraska
- New Mexico
- North Dakota
- Oklahoma
- South Dakota
- Utah
- Wyoming

San Francisco, Calif.:
- Alaska (may not have to attend)
- California
- Hawaii
- Idaho
- Nevada
- Oregon
- Washington

Orientation to be covered by mail:
- American Samoa
- Canal Zone
- Guam
- Trust Territories
- Virgin Islands

VOCATIONAL EDUCATION DIRECTORY OF PUBLIC AND PRIVATE SCHOOLS

Attachment B—Performance Requirements and Specifications

I. WORK STATEMENT.

Work to be performed by the contractor will be the collection, editing, and preparation of data on public and private secondary and postsecondary vocational education schools. Detailed descriptions of the data requirements, data definitions, editing, and data preparation requirements will be provided by June 30, 1971.

Task 1. Data Collection

Data are needed on both public and private institutions which may require two different data-collection systems. The contractor may collect the required data in any manner it desires. Survey forms will be prepared by OE and made available to the State. If the data are already a matter of record in State files, the contractor may extract the data from such reports. If the data are not available, the contractor may use the OE forms or its own forms.

Task 2. Editing

The exhibits specify the editing requirements which will be incorporated into a machine edit program to be developed by NCES. The contractor should check each record to insure that it is complete, contains valid codes, has no duplicate OE numbers, and that reported totals equal the computed sum of the addens.

The contractor will be responsible for conducting this machine edit. The contractor will be responsible for entering any necessary data field corrections and noting all valid exceptions to any key item or tolerance checks on this listing.

NCES will audit records provided by the contractor, as soon as all records for a given part have been received from the contractor. If errors exceed the level of tolerance all records will be returned to the contractor. The entire list should be corrected by the contractor before returning to NCES. Final payment is contingent upon receipt of the corrected edit-check failure listing from the contractor.

Task 3. Data Preparation

1. Format. Contractor may transmit data on forms, punched card or magnetic tape medium according to NCES record formats specified in the exhibits. Punched cards shall be 80 column, Hollerith code. Magnetic tape shall be IBM 360, 7 track 800 BPI density, 9 track-800 BPI density, or 9 track-1600 BPI density with standard IBM labels. The blocking factor shall bt 10 records per block. All tapes shall be in card image format. If data are keypunched from source documents, 100-percent key verification is required.

2. Record identification Coding. NCES has assigned identification numbers to each school system in its school system universe file and to each public secondary school in its school universe file. The identification numbers are unique within each State. Each record preparated for NCES under this contract must contain the NCES identification number of the school and/or school system. To facilitate this coding NCES will provide each contractor with a list of public secondary schools and their identification numbers. Preprinted forms will be provided each contractor which include the code numbers and other identifying data on the schools for which a current number exists. A series of blank numbers also will be assigned each contractor with instructions for assigning them to schools with no prior number.

For private secondary and public and private postsecondary schools, NCES will provide each State with a list and numbers of the schools for which OE vendor numbers have already been assigned and instructions for assigning numbers to other schools.

Numbers are assigned to new schools by selecting the next unused number, entering the name of the new school next to it, and getting this number into the record. The contractor must develop control procedures which will prevent assignment of duplicate identification numbers which cannot be accepted by NCES and will be returned for corrective action.

II. MATERIALS AND SERVICES TO BE PROVIDED BY THE CONTRACTOR.

The contractor shall furnish all personnel, printed and other materials, and such services as may be necessary to provide the required data on forms, punched card or magnetic tape medium. The contractor may sub-contract for printing, personnel, or other services without any requirement for OE prior approval. If the contractor requests return of its tape(s), NCES guarantees the return of the contractor tape(s) within 60 days of receipt by NCES in good condition.

On November 1, 1971 the Contractor should provide a brief (one to two pages) progress report on the status of its progress toward meeting the December 31, 1971 completion date.

III. MATERIALS AND SERVICES TO BE PROVIDED BY THE GOVERNMENT

The Government will furnish, as requested:

a. An adequate supply of printed survey forms, pre-addressed for all institutions with OE code numbers.

b. A list or card file of identification numbers for respondents included in the samples of universe.

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c. A list of colleges and universities, form which data need not be obtained.

d. A supply of postage-free return addressed envelopes.

e. Such personnel as may be needed to monitor this contract and answer technical questions about performance requirements.

IV. REIMBURSEMENT

For services rendered, OE agrees to reimburse the contractor according to the following schedule:

a. $2.00 per complete public secondary and post-secondary school record.

b. $4.00 per complete private secondary school record.

c. $5.00 per complete private postsecondary school record.

For purposes of reimbursement, only those public schools which offer vocational education are counted. Similarly, only those private schools which offer vocational education and which fall into the definition for inclusions are counted.

V. PROJECT DIRECTOR

The contractor shall name a project director who shall have responsibility for managing the project and meeting the requirements contained in the contract. The project director shall serve as the contractor's contact with the NCES project monitor. The project director may serve less than full-time on the project.

VI. REGIONAL TRAINING WORKSHOPS

NCES shall schedule and conduct regional survey mangement workshops for project directors in Atlanta, Boston, Chicago, Denver, San Francisco, and Washington. Each workshop will last approximately 8 hours. The purpose of these workshops is the discussion in detail the data requirements for the Vocational Education Directory project, data collection methodologies, terminology and definitions, and editing requirements and techniques. Contractor personnel will be expected to bring copies of the survey forms, or existing records, and participation in discussions of successful methods of collecting, preparing, and editing employed by the contractor.

These workshops shall be scheduled during the summer of 1971. Each contractor shall be expected to send its project director to the workshop nearest his home city. However, because of the distances involved the following contractors will not be expected to send representatives to these workshops: American Samoa, the Canal Zone, Guam, the Trust Territories, and the Virgin Islands. Under unusual circumstances, and with the consent of the NCES project monitor, the project director may be permitted to attend some other workshop.

NCES will reimburse, as a part of this contract, the contractor in the amount of round trip air fare, coach class, or automobile mileage at the rate of $0.09 per mile (total not to exceed air fare). Per diem at the rate of $25.00 per day also will be reimbursed.

VII. DUE DATES

Data should be provided to NCES on the following schedule: Secondary Schools, December 31, 1971; Postsecondary Schools, December 31, 1971.

Provision is made on the contract form for the contractor to stipulate other dates than the above and sign contingent upon OE acceptance of such stipulations. OE will attempt to negotiate mutually acceptable due dates if it finds the contractor stipulations to be unacceptable.

VIII. PAYMENT SCHEDULE

Sixty percent of payment due for each part shall be made upon receipt of each part by NCES. The invoice for the first part submitted may include the travel expense incurred by the project director as provided in paragraph V.

Balance of payment due shall be made when corrected edit check failure lists (paragraph I, Task 2) have been received by NCES and posted to the file. Partial and final payments shall be made for each part separately.

IX. FINAL REPORT

Upon completion of this contract the contractor shall submit a final report which shall contain:

a. A description of the procedures employed by the contractor to gather and prepare the data including copies of any survey forms, other than those provided by OE, that were used.

b. A description of problems encountered in data collection and preparation, and how such problems were solved.

c. A general evaluation of the total project.

X. RELEASE OF DATA

OE reserves the right to publish and otherwise release to other Federal agencies any or all of the vocational education directory data provided by the contractor under this contract. Release of data to non-Federal users will be at the discretion of the Assistant Commissioner for Educational Statistics in conformity with the current CEDS/NCES disclosure policy and Federal legislation regarding disclosure of information.

The contractor should retain the source data survey forms, if used, or any intermediate records used to prepare data tapes for at least 12 months after the end of this contract.

[Attachment C forms retained in subcommittee files.]

ATTACHMENT D—COST SHARING ESTIMATES

State ____________

Estimated Payment Schedule:			
Public Secondary Schools	______	Institutions @ $2.00	$ ______
Private Secondary Schools	______	Institutions @ $1.00	$ ______
Public Postsecondary Schools	______	Institutions @ $2.00	$ ______
Private Postsecondary Schools	______	Institutions @ $5.00	$ ______
Subtotal Institutional Expense Estimated Workshop Expense			$ ______
Grand total			$ ______

3-2 *Why is this formality necessary?*

The formality is really a matter of reaching definite agreement with States on the best way to conduct surveys—such that NCES will have the greatest likelihood of obtaining requested data on surveys, the response to which is voluntary.

Without agreements such as provision of the annual data plan, it would be difficult for respondents to separate legitimate requests for data form uncoordinated ones. Without controls, there would be a serious proliferation of requests imposed; the result would be that respondents would set priorities, not OE, and the lack of adequate response for effective use on *any* data collection.

Nine months lead time has been agreed to as a necessary interval for enabling States to gear up State/local systems of record keeping and reporting to meet new data requests.

3-3. *Do any other Federal Statistical Centers obtain such agreements before they collect data?*

Office for Civil Rights, Equal Employment Opportunities Commission, Department of Labor, Department of Agriculture, The National Center for Health Statistics, (et al) have varying kinds of cooperative arrangements and formal agreements with respondents. Such agreements range from commitments to work *through* the State agency to collect data from locals (EEOC, OCR), to agreements to accept data in alternative modes (eg. on tape rather than hard copy forms provided by the federal agency—OCR, EEOC) to provision of funding for personnel to collect and edit data at the State/local level on behalf of the federal government (Department of Agriculture).

The National Center for Health Statistics has developed a program, with formal contracts with State Health Departments, under The Cooperative Health Statistics System. The Federal Government provides guidelines on each statistical module for the States and standards on minimum contents, on definition and on quality. Communication is also facilitated between the States and Washington by (1) providing technical assistance to the states from headquarters, and (2) providing general consultation and coordination from the regional offices. The program is budgeted for between $5 and $5.5 million in FY 75 with contracts expected to go over 30 States.

The Bureau of Labor Statistics has major contractual relationships with the States for the establishment surveys and certain other surveys. Contracts are based on the number of positions supported with a State. This is done annually by negotiations, with level of funding determined by prior year levels and expected growth in activities. A formula based on sample size and number of geographic areas surveyed is used. BLS provides manuals, validation, sampling plans and collection forms.

3-4. *If these agreements are anything other than "mere formality," does that mean that the States are determining what kinds of data will be collected by NCES?*

The agreements are other than "mere formality," in the sense that NCES stands by its commitments (1) to work *through* the States before going to local agencies for data, (2) to provide 9 months lead time to respondents, (3) to involve States in the design of surveys and (4) to include States in the review of the OE Annual Data Plan. These argeements speak more to the *methods* by which data will be collected than to the actual data elements to be collected. The States are in a position to recommend to NCES better ways to obtain data which must be collected, but do not determine what data will be collected by NCES. Committees of the Chief State School Officers have assisted in our survey planning and have expressed no substantial opposition to the collection of data normally in their data system. They have expressed opposition to any major expansion of the data collection until such time as some responsible decision is made concerning those items of information to be collected on a regular basis in the future. They explain that the cost of constantly revising their data systems is prohibitive to making temporary and multitudinous changes. One of the specific features of the Common Core of Data (CCD) program (see reply to question 8) is directed at reaching such decisions. We are involving policy officials at Federal, State, and local levels in a definitive determination of a common core of data elements which may be expected to serve basic policy needs for the moderate range future.

3-5-7. *What kinds of data have the States prohibited NCES from collecting? What kinds of data have the States limited NCES access to? If these agreements are restrictive in any way, what alternatives can NCES recommend to overcome these obstacles?*

No general prohibitions on the collection of particular data sets have been made by the States. However, NCES has worked closely with States on the development of surveys which call for delivery of data about *individual* students or teachers. States have advised against collection of behavioral data on students in terms of teachers' opinions, for example. In addition, some States have prohibitions on the release of certain data without specific authorization of the individuals involved (eg., data on individual staff members in New York State). Such restrictions highlight the need for NCES to work cooperatively with States on survey design and implementation.

The agreements facilitate overcoming the reasonable restrictions cited above. With the agreements we can in many cases negotiate access to data which if requested directly and without explanations would legitimately be refused.

4. Standard Terminology Projects.

NCES rightfully claims high priority to its "standard terminology projects," including the so-called "Handbook Series." After all, if income or population were defined differently from one political jurisdiction to another, comparisons between those jurisdictions would be meaningless. Yet there is some question as to how successful the NCES projects have been. Again, NCES seems to depend on a great deal of voluntary cooperation from State and local education officials.

How much cooperation (with State and local educational officials) has there been for these (standard terminology handbook) projects?

Response: Cooperation with State and local education officials has been extensive. Taking, for example, Handbook VI, *Standard Terminology for Curriculum and Instruction in Local and State School Systems*, the primary body of persons who worked with NCES represented 13 national organizations whose members are largely State and local school system people. The group met in three three-day conferences to review developing handbook drafts and make recommendations. In addition, some 60 other national organizations and agencies participated in some direct manner, the coverage including virtually all of the educational spectrum. Eighteen special committee meetings, each in session from 3 to 5 days to come to agreements on subject-matter descriptors, were held. There were, also, 10 regional conferences, two days each, in which many more State and local educational representatives took part in critical reviews of drafts. Hundreds of persons in 31 conferences, and in other communication, had a part in the project, and brought about definite agreements on its terms, classifications and definitions.

This procedure has been followed, generally, in the development of all of the manuals in the "Handbook Series."

What has been the extent of implementation of each of the projects?

Response: An implementation of the standard descriptors and terms in any of the handbooks is accomplished through an inclusion of the terms, as defined, in local and State school system records and reports. Handbook I, *The Common Core of State Educational Information (1953)*, served as the basis for the Office of Education *Biennial Survey of Educational Information* for almost two decades. In similar manner, the Office of Education *Fall Report* was based on Handbook I. *All States* based these reports on Handbook I.

Original Handbook II, *Financial Accounting for Local and State School Systems (1957)*, has, from its publication year, served as the basis for school finance revenues and expenditures. Virtually all school system budgeting and accounting in the nation are in the categories and terms of original Handbook II, widely implemented. The handbook, in addition to its first issuance, was reprinted five successive times as demand for it persisted.

Much the same kind of use has been made of each of the handbooks of standard educational terminology, serving as basic references in virtually all educational records and reports development in local and State school systems. Even handbook drafts are sought, long before their publication. Handbook VIII, *Community Information in Education*, still not field tested because of lack of funds, is in draft forms. Copies of the draft are requested frequently.

Would stronger legislative mandates assist NCES in these essential projects?

Response: Yes. Appropriate and workable legislative mandates, legislative support, and a promulgation of administrative regulations, mutually consistent, have potential for strengthening the entire effort to implement the standard terminology in the "Handbook Series."

The subject-matter classifications, descriptors, and definitions in Handbook VI, *Standard Terminology for Curriculum and Instruction in Local and State School Sytems*, have recently been made a DHEW Information Processing Standard. It is the first DHEW standard of its kind, and amounts to an administrative ruling that all HEW requests for subject-matter data shall be based on the terminology appearing in Handbook VI. A responsibility is placed on NCES to amend the standard annually. This, and the DHEW recommendation that this first such standard become, also, a Federal Data Standard, is a step in progress toward improved comparability of educational data. Similar steps are planned in each of the educational terminology fields.

Wherever Federal funds are substantially involved, consistency in use of terminology is important for effective management and evaluation. In such cases, use of the standard terminology for recordkeeping and reporting might legitimately be mandated. Legislative action to enable NCES to require reports, where all reports to NCES is now voluntary, would, with the administrative actions planned, lead to more uniform use of the handbooks.

What disadvantage does NCES see in following this (legislative mandates) course of action?

Response: None, save the matter of allocating adequate resources to accommodate such mandates. Effective accomplishment of comprehensive implementation of these standards will require issuance of guidelines, more frequent updating, augmented communication with many agencies of Government and the field, and technical assistance in the field. Resources to accomplish the work are essential, and legislative support to this end is most important.

5a. *NCES appears to avoid all comparisons of educational status, such as rankings indicating which States spend the most for education, which school districts have the highest tax effort for education, and which districts pay their teachers the highest salaries. Why is there such reluctance to provide answers to these popular questions?*

NCES is cautious about emphasizing comparisons among States, Districts, or Institutions. We present data by State, by major institution, and by the very largest Districts, in the context of analytic reports which enable the reader to evaluate the conditions and circumstances which explain variations among reporting entities. A current example is a manuscript (254 pp) now in publication: "Profiles in School Support—a Decennial Overview" which presents information on financial support on a comparative basis over time, among States, considering Foundation Programs (i.e., State-assured minimum levels of support per child), equalization trends, and load, ability, and effort factors. It also considers variations in cost levels, and economies of scale as reflected by sizes of school systems. Another recent example is the March 25, 1974 Management Bulletin on Intrastate and Interstate Disparities in Current Expenditure per Pupil: 1971–72, which follows:

INTRASTATE AND INTERSTATE DISPARITIES IN CURRENT EXPENDITURE PER PUPIL: 1971–72

Intrastate Disparities

For the school year 1971–72 the lowest current expenditure per pupil in average daily attendance reported for a school district was $288; the highest, $7,934.

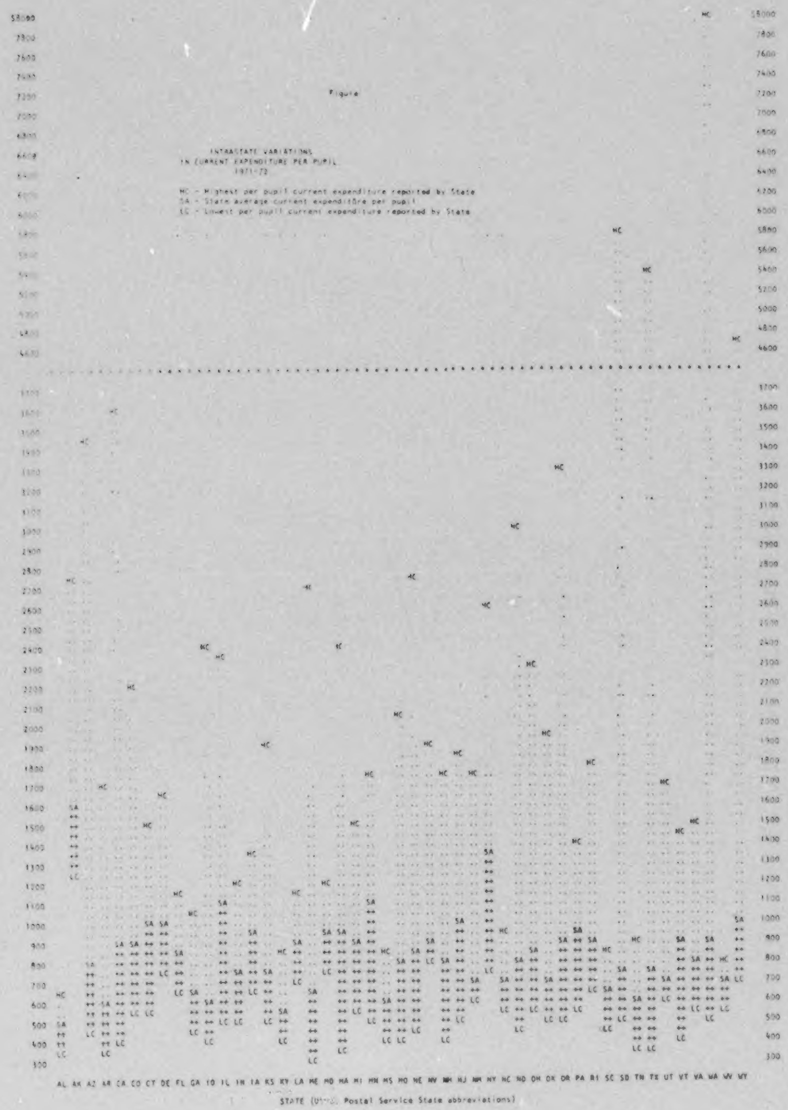
In six States the highest current expenditure per pupil reported by school districts was less than the national average, $836.

In one State the lowest current expenditure per pupil reported by a school district was greater than the national average.

The data presented in tables 1 and 2 and in figure 1 were taken from annual statistical reports published by State education agencies. These State reports are based on standards and definitions used by each State to collect data from their local school systems. Since some variation exists among the States, the data may not be fully comparable from State to State. However, the lowest and highest per pupil expenditure reported by school districts in each State are comparable to the State's average expenditure per pupil.

Before attempting interstate analysis of these data the characteristics of each State's foundation program and aid distribution formulas must be carefully examined.

The highest current expenditure per pupil reported by school districts in each State must be interpreted with great caution. Examination of the State reports showed, in many instances, that the district reporting the highest expenditure per pupil (HC) was frequently a very small district located in a sparsely populated, remote area. (See "Data Limitations" section.)



Figure

INTRASTATE VARIATIONS
IN CURRENT EXPENDITURE PER PUPIL
1971-72

HC - Highest per pupil current expenditure reported by State
SA - State average current expenditure per pupil
LC - Lowest per pupil current expenditure reported by State

STATE (U.S. Postal Service State abbreviations)

Figure 1 depicts the magnitude of intrastate disparity.

The school district which reports the lowest current expenditure per pupil (LC) tends to be closer to the State average (SA) than the district which reports the highest (HC) in most States.

Approximately half the States show a relatively small range between the highest and lowest expenditure per pupil.

The data presented in table 2 were derived by dividing the highest current expenditure per pupil reported by a district by the lowest reported in each State. The resulting ratio is used to measure the degree of intrastate disparity. Data for 1971-72 were taken from the State reports, while data for 1969-70 were taken from an unpublished study prepared for the President's Commission on School Finance.

In FY 70 disparity ratios in excess of 10.0 to 1 were reported in eight States, with the largest ratio in the order of 56.2 to 1.

In FY 72 only three States reported disparity ratios in excess of 10.0 to 1, with the largest ratio in the order of 19.5 to 1.

In four of the six States where the highest current expenditure per pupil was less than the national average, the disparity ratios were less than 2.0 to 1.

A disparity ratio of 3.0 to 1 or less was reported in 23 States, 2.0 to 1 or less in six States.

The smallest disparity ratio (1.4 to 1) was reported by the same State (West Virginia) for both years.

The largest ratio reported for both years was also by the same State (Texas): 56.2 to 1 in FY 70 and 19.5 to 1 in FY 72.

Six States showed disparity ratios of 2.0 to 1 or less for both years; all were located in the Southeast region of the U. S.

TABLE 1.—RANGE OF CURRENT EXPENDITURE PER PUPIL IN AVERAGE DAILY ATTENDANCE, BY STATE, 1971-72

State	State average	Low district	High district	State	State average	Low district	High district
Alabama	505	368	688	Montana	N/A	N/A	N/A
Alaska	1,593	1,254	2,763	Nebraska [3]	835	470	2,745
Arizona [1]	779	437	3,445	Nevada	883	793	1,876
Arkansas [2]	601	332	1,717	New Hampshire [3]	779	410	1,727
California	896	402	3,622	New Jersey [3]	1,013	492	1,862
Colorado	884	534	2,216	New Mexico [3]	710	606	1,747
Connecticut [5]	1,011	547	1,522	New York	1,358	731	2,617
Delaware	980	749	1,652	North Carolina	719	568	967
Florida	871	673	1,174	North Dakota [2]	796	435	2,991
Georgia	663	441	1,065	Ohio [3]	869	550	2,317
Hawaii	N/A	N/A	N/A	Oklahoma [2]	720	489	1,956
Idaho	584	434	2,393	Oregon	912	499	3,316
Illinois	[3] 1,104	482	2,357	Pennsylvania	943	531	1,407
Indiana [4]	771	496	1,202	Rhode Island	876	654	1,801
Iowa [3]	953	557	1,346	South Carolina	638	461	849
Kansas [3]	751	499	1,876	South Dakota [3]	738	486	5,737
Kentucky	531	392	837	Tennessee	610	344	912
Louisiana	875	716	1,156	Texas	732	332	6,474
Maine [3]	673	288	2,761	Utah	679	605	1,678
Maryland [3]	928	732	1,194	Vermont [3]	878	415	1,435
Massachusetts [3]	951	365	2,418	Virginia	803	569	1,475
Michigan [3]	875	554	1,510	Washington	964	497	7,934
Minnesota [3]	1,104	498	1,768	West Virginia	688	565	802
Mississippi	583	409	826	Wisconsin	N/A	N/A	N/A
Missouri	812	389	2,048	Wyoming [3]	999	695	4,332

[1] Does not include Federal funds.
[2] Estimated.
[3] Base is average daily membership.
[4] Does not include ESEA funds.
[5] Budgeted estimates.
[6] Includes unified districts only; base is fall membership.

N/A—not available.

TABLE 2.—SCHOOL DISTRICT PER PUPIL EXPENDITURE DISPARITIES, BY STATE, FISCAL YEARS 1970 AND 1972

	Disparity ratio[1]			Disparity ratio[1]	
	1969–70	1971–72		1969–70	1971–72
Alabama	2.0	1.9	Montana	NA	NA
Alaska	3.8	2.2	Nebraska	12.4	5.8
Arizona	7.1	7.9	Nevada	2.2	2.4
Arkansas	3.4	5.2	New Hampshire	4.8	4.2
California	7.9	9.0	New Jersey	5.9	3.8
Colorado	6.3	4.1	New Mexico	2.5	2.9
Connecticut	6.3	2.8	New York	11.4	3.6
Delaware	1.7	2.2	North Carolina	1.6	1.7
Florida	1.8	1.7	North Dakota	24.0	6.9
Georgia	2.0	2.4	Ohio	4.1	4.2
Hawaii	NA	NA	Oklahoma	29.7	4.0
Idaho	6.6	5.5	Oregon	11.4	6.6
Illinois	5.9	4.9	Pennsylvania	7.9	2.7
Indiana	2.6	2.4	Rhode Island	2.3	2.8
Iowa	2.0	2.1	South Carolina	1.5	1.8
Kansas	3.2	3.8	South Dakota	34.2	11.8
Kentucky	2.6	2.1	Tennessee	2.5	2.7
Louisiana	1.8	1.6	Texas	56.2	19.5
Maine	9.1	9.6	Utah	2.8	2.8
Maryland	1.6	1.6	Vermont	4.2	3.5
Massachusetts	9.3	6.6	Virginia	2.6	2.6
Michigan	3.1	2.7	Washington	9.2	16.0
Minnesota	4.0	3.5	West Virginia	1.4	1.4
Mississippi	2.6	2.0	Wisconsin	NA	NA
Missouri	9.1	5.3	Wyoming	26.2	7.0

[1] The highest current expenditure per pupil reported divided by the lowest.

NA—Not available.

Interstate Disparities

Data presented in table 3 and figure were taken from the forthcoming NCES publication *Expenditures for Public Elementary and Secondary Education: 1971–72* States are required to report these data according to standard definitions prescribed in the Elementary and Secondary Education Act, PL 89–10. These data are therefore comparable among the several States, and interstate comparisons may be made with few qualifications. Table 3 includes all expenditures made by and on behalf of local school districts.

The State average current expenditure per pupil exceeded the U. S. average in 17 States, while 33 States reported a State average below the U. S. average.

The U. S. average was approximately 3.3 times as much as the lowest current expenditure per pupil reported by a school district (Maine).

The highest current expenditure per pupil reported by a school district (Washington) was approximately 8.2 times the U. S. average.

The highest State average reported was approximately 1.7 times the U. S. average.

The U. S. average was slightly more than 1.5 times the lowest State average.

Connecticut (among the highest State averages) reported the lowest percent of expenditure from Federal funds: 3.8%.

Mississippi (with the lowest State average) reported the greatest percentage of expenditure from Federal funds: 28.2%.

The 14 States which reported average daily attendance in excess of 1,000,000 accounted for 63.2% of the U. S. total average daily attendance.

These 14 States also accounted for 66.6% of the U. S. total current expenditure.

Figure 2 depicts the interstate disparities in currnet expenditure per pupil as measured by the ratio of State average to U.S. average. The States are arranged in descending order on the ratio scale, each symbol representing a State. Figure 2 must also be interpreted with great care.

Figure 2

RATIO OF STATE AVERAGE CURRENT EXPENDITURE PER PUPIL

TO U. S. AVERAGE CURRENT EXPENDITURE PER PUPIL: 1971-72

(Each symbol represents a State)

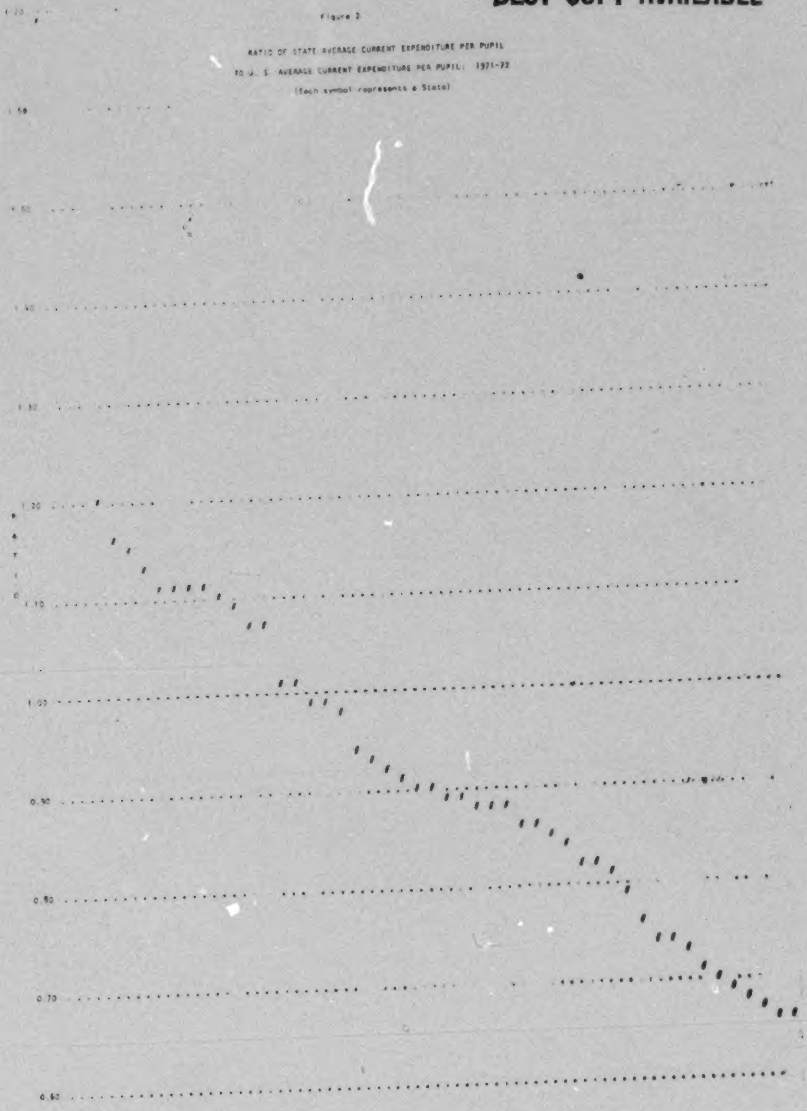


TABLE 3.—AVERAGE DAILY ATTENDANCE, CURRENT EXPENDITURES, AND PERCENT OF EXPENDITURES, BY SOURCE OF FUNDS, AND BY STATE, FISCAL YEAR 1972[1]

	Average daily attendance (ADA) (in thousands)	Current expenditures		Percent of expenditure, by source	
		Thousands of dollars	Dollars per pupil	Federal	State and local
Totals	42, 482	$40, 896, 296	$963	9. 1	90. 9
Alabama	746	483, 248	648	21. 0	79. 0
Alaska	78	126, 870	1, 628	21. 0	79. 0
Arizona	428	363, 011	848	12. 3	87. 7
Arkansas	413	265, 018	640	22. 9	77. 1
California	4, 580	4, 330, 030	946	6. 1	93. 9
Colorado	525	471, 843	899	8. 4	91. 6
Connecticut	615	709, 793	1, 154	3. 8	96. 2
Delaware	124	132, 536	1, 068	8. 5	91. 5
District of Columbia	130	164, 378	1, 264	33. 0	67. 0
Florida	1, 354	1, 179, 339	871	10. 8	89. 2
Georgia	1, 000	677, 441	677	16. 2	83. 8
Hawaii	169	174, 138	1, 031	14. 6	85. 4
Idaho	176	119, 339	679	11. 9	88. 1
Illinois	2, 133	2, 257, 677	1, 058	7. 2	92. 8
Indiana	1, 126	979, 182	870	4. 8	95. 2
Iowa	624	608, 417	976	6. 0	94. 0
Kanasas	462	394, 433	854	8. 8	91. 2
Kentucky	667	443, 213	664	19. 8	80. 2
Louisiana	773	654, 703	847	13. 4	86. 6
Maine	231	188, 099	814	9. 4	90. 6
Maryland	809	894, 354	1, 106	8. 9	91. 1
Massachusetts	1, 123	1, 075, 473	958	5. 0	95. 0
Michigan	2, 036	2, 206, 103	1, 084	7. 4	92. 6
Minnesota	850	948, 940	1, 117	6. 4	93. 6
Mississippi	494	312, 234	632	28. 2	71. 8
Missouri	922	764, 838	829	10. 3	89. 7
Montana	161	141, 521	876	4. 6	95. 4
Nebraska	316	280, 402	889	9. 8	90. 2
Nevada	120	108, 605	902	9. 5	90. 5
New Hampshire	154	126, 751	824	8. 6	91. 4
New Jersey	1, 358	1, 722, 986	1, 268	5. 8	94. 2
New Mexico	260	210, 705	810	22. 5	77. 5
New York	3, 106	5, 005, 597	1, 611	7. 7	92. 3
North Carolina	1, 083	776, 107	717	16. 4	83. 6
North Dakota	139	109, 927	792	16. 5	83. 5
Ohio	2, 246	1, 898, 718	845	6. 5	93. 5
Oklahoma	578	413, 052	715	13. 0	87. 0
Oregon	435	463, 545	1, 065	8. 0	92. 0
Pennsylvania	2, 188	2, 331, 951	1, 066	7. 2	92. 8
Rhode Island	167	178, 124	1, 068	8. 5	91. 5
South Carolina	582	410, 185	705	19. 3	80. 7
South Dakota	158	123, 823	783	14. 4	85. 6
Tennessee	846	550, 491	651	16. 2	83. 8
Texas	2, 500	1, 899, 847	760	10. 2	89. 8
Utah	278	203, 516	733	11. 1	88. 9
Vermont	104	99, 467	955	6. 4	93. 6
Virginia	1, 008	863, 586	857	14. 9	85. 1
Washington	746	722, 127	968	5. 5	94. 5
West Virginia	382	301, 493	789	14. 5	85. 5
Wisconsin	900	947, 178	1, 053	4. 4	95. 6
Wyoming	81	82, 938	1, 026	7. 6	92. 4

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[1] Expenditures for Public Elementary and Secondary Education: 1971-72.

Data Sources

Unless otherwise indicated, data used in this bulletin were extracted from statistical reports published by the various State education agencies. In several States where such published reports were not available, State statistical personnel furnished data from unpublished sources. In a few instances, State personnel furnished estimates.

Data Limitations

There is no universally used definition of "current expenditure." Each State prescribes by statute and regulation those costs which are to be included in this category. It is known that variations among States in the definition of costs to be regarded as current expenditure exist, but the specific differences and the magnitudes of variation are not known.

Data presented in tables 1 and 2 and figure 1 are subject to these variations. As indicated, interstate comparisons of these data must be undertaken with great caution, lest spurious conclusions be reached. It should also be noted that 18 States used average daily membership (ADM) as the basis for computing current expenditure per pupil, while the remaining States used average daily attendance (ADM) for this purpose. By definition, ADM is always greater than ADA, hence current expenditure per pupil in ADM is understated when compared to current expenditure per pupil in ADA.

In some States the intrastate disparities tend to be somewhat exaggerated by the highest current expenditure per pupil reported by a school district. Data from these States showed that the high-cost district was usually located in a remote, sparsely populated area and enrolled fewer than 10 pupils. In an unpublished study prepared for the President's Commission on School Finance it was observed that the disparity ratio, when all districts were included, exceeded 10.0 to 1 in nine States. But when the upper and lower 5 percent of the districts were excluded from consideration, only one State reported a ratio in excess of 5.0 to 1. The sources of data available in the present study were such that disparity ratios could not be computed in this manner.

5b. *The National Assessment Project was designed to answer questions about educational output and achievement, yet it was specifically designed so that these answers could not be used to make comparisons between States or school districts. Why did the Office of Education go to so much trouble to limit so severely the results of this important (and costly) project? If objections were made to these comparisons by Congress, State and local officials, or the public, please document.*

The Office of Education has not limited the scope of National Assessment, except as budgetary constraints have required doing so. The design of National Assessment was conducted by a private Exploratory Committee for Assessing Progress in Education (ECAPE), later CAPE, under Foundation funding. The major task for National Assessment was defined as the development of a model of testing which could measure change over time in national educational achievement. OE, upon assuming the funding responsibility for actual data collection, concurred in the view that as a new undertaking with broad national scope, the first order of business is refinement of National Assessment methodology.

The cost for the present program yielding national estimates is $6 millions in 1974 dollars (although the Congress limited the appropriation to $4.5 millions in FY 1974, eliminating and stretching out deliveries of some of the products.) For State estimates, the cost would be approximately $25 million per year. The design is capable of ready extension to provide State estimates, if the demand is deemed to justify the additional costs. The Office does not recommend this extension at the present time.

In response to NCES urging, NAEP has set up a department of Utilization Application which makes available the NAEP model and methodology to States and local school districts, as well as encouraging uses of the findings. Thirty-four States are using the National Assessment methodology, through adoption or adaptation, in developing their own State assessments. Six States have used the NAEP materials and procedures so that they are able to compare their State's findings with the National Assessment data base. The number of States actively participating in NAEP annual workshop has increased from 10 in 1971, to 30 in 1972, and to 36 in 1973.

It is also true that there has been a history of opposition to National Assessment because in the early days it was feared that it would lead to a national curriculum, national testing and invidious comparison. A memorandum of January 9, 1967, from the Executive Committee of the American Association of School Administrators (AASA) to its members illustrates a feeling which was shared by many groups and individuals at the time. The document, *AASA opposes National Assessment*, reports on a resolution passed at the AASA 1966 convention in which National Assessment is considered as synonymous with national testing and as a step toward a national curriculum. Such an effort would "infringe upon the legal responsibilities of the State and the school system and the professional responsibilities of the individual teachers. . .". Therefore AASA "recommends to its members and the educational institutions which they serve that they refuse to participate in the try-outs of these tests and in the eventual testing program—presently slated for the fall of 1967. The document further states, "Let no one be deceived. Although labeled an 'assessment' program the NAEP is a national testing program and as such it will be coercive, it will inevitably lead to the pressures of regional, State, and local comparisons, and it will have national overtones in the dispensing of Federal aid."

Congressional concern regarding National Assessment was expressed by Rep. Robert Michel in a speech "One More Step Down The Road To National Testing" given before the House on September 23, 1965. In 1967 hearings before the House Appropriations Subcommittee Departments of HEW and Labor Hearings, (89th Congress, 2nd Session, Part II, p. 112) Congressman John Fogarty discussed a newspaper article reporting that the President of the National Conference of Teachers of English regarded National Assessment as leading to a national curriculum and loss of local control.

6. *It is understood that State and local educational officials sometimes refuse to provide data to NCES, and because of the anticipated refusals, NCES does not attempt to collect some kinds of data. How often do these refusals occur? What kinds of data appear to be the most sensitive? How important are these refusals to the overall data collection efforts of NCES? Please document recent refusals, as well as the basis for the anticipated refusals. Would stronger legislative mandates assist the NCES solution for these problems?*

Data item refusals can occur in one of four ways. They can:

(1) be anticipated on the basis of past experience and not included in the questionnaire;

(2) be screened out during the survey planning process, generally at the request of State or local officials;

(3) result in questionnaire form non-response; or

(4) result in questionnaire item non-response.

Form and item non-response have diminished in recent years to the point where they are not regarded as impacting the quality of our statistical data. The one exception is the private elementary-secondary school sector. For well-established survey series, like the Elementary-Secondary General Information Surveys (ELSEGIS) and the Higher Education General Information Surveys (HEGIS), the questionnaire form response rate varies between 97 and 100 percent. For more recent survey series, such as the Consolidated Information Report (CPIR), the questionnaire form response rate is generally about 90 to 95 percent, or better. Item nonresponse, after intensive editing and follow-up, is generally only a percent or two and imputation techniques are utilized to handle these omissions. For the National Assessment project, the refusal rate is about five percent which is not regarded as significantly affecting this data collection effort.

This generally optimistic picture is, in part, the result of intensive and coordinated planning with representatives of respondent groups and the selection of surrogate data items for sensitive ones. In part, it is due to hard work by NCES personnel to overcome refusals (or response tardiness) after the questionnaires are in the field. The latter effort, however, is costly in utilization of manpower resources and impacts adversely on the timeliness of our statistical publications.

The following types of data are among the most sensitive:

(1) questions relating to racial attitudes and religion;

(2) personal student data, particularly relating to family income and level of parental education;

(3) school data on transportation;

(4) expenditures for State Education Agency administration;

(5) fiscal information for nonpublic schools and proprietary postsecondary schools;

(6) placement record for graduates of proprietary postsecondary schools; and

(7) data collections which have not been reviewed or anticipated by the States or which State officials feel are "nice-to-know" questions rather than necessary for program or policy-makers.

Prior experience has persuaded NCES that items (1), (2), (5), and (6) above are sensitive items and cannot be successfully collected, or can be collected only with difficulty and with strong protection for maintaining privacy of the data. Alternative strategies are frequently available. For example, by asking individual students about household attributes (second car, color TV, periodicals, etc.), NCES can obtain data which may be combined to provide a measure of family income. Or, by asking noncollegiate postsecondary institutions about student charges, NCES can obtain a fairly good measure of the institution's gross operating budget.

Refusals are not a serious impediment to the overall data collection program of NCES. We recognize the legitimate desire of individuals to maintain privacy in certain sensitive topics, and regard it as important to cooperate in protecting that privacy. This poses an important professional responsibility for creative survey design and data base maintenance in order to serve national policy needs and simultaneously protect personal privacy.

A listing of recent refusals follows:

(1) *Longitudinal Study of Education Effects.*—251 primary and 156 backup schools declined to participate in the base-year study largely because it was a busy time in the school year rather than the sensitivity of the data.

(2) *School Staffing Survey.*—Two large city LEAs refused to permit schools in their district to participate and one State Education Agency refused to allow participation in the State. One city was involved in a teacher strike; the other city was busy with teacher conferences and seminars with regard to school desegregation. The issue in the SEA was local politics, involving keeping Federal authorities from obtaining information with regard to the State.

(3) *National Assessment of Educational Progress.*—About five percent of schools refuse to participate; generally, for one of the following three reasons:

(a) The school is preoccupied with the implementation of a court-ordered desegregation plan and is unable to participate.

(b) There was a teacher strike recently and there is much catch-up work to do, or

(c) Major efforts are underway to prepare and implement State assessment and the school is unable to find time for other activities.

(4) *Consolidated Program Information Report.*—Six States refused to participate in providing data for State samples although they did participate in providing data for National samples. The major factor accounting for these refusals was the volume of data requested and specifically the amount of effort and cost required to provide the State sample data.

(5) *Higher Education General Information Survey.*—Two institutions refuse to respond to a large part of the survey; one on the basis that it is not the Federal government's business since they get no Federal money and the other because it is too much work.

(6) *Elementary-Secondary General Information Surveys.*—One State did not participate in several of the component parts of this package because of lack of staff and accounting system problems. One State did not participate in one component part requiring State aggregations because one large school system within the State did not maintain fiscal records in a form consistent with the required report while a second State has not participated because of internal administrative and personnel problems. Two territories did not participate in one component part of this survey package because they lacked sufficient staff.

(7) *Survey of Programs and Enrollments in Noncollegiate Postsecondary Schools.*—One or two percent of the respondent institutions refused because of fear and distrust of the Federal government and concerns over competition from public community colleges.

If Congress considers its appropriate stronger legislative mandates would be of substantial assistance to NCES. Emphasis on the importance of the program helps us to motivate respondents to reply voluntarily. Authority to require reporting on a compulsory basis, with reasonable latitude for selective enforcement, would assist NCES to improve the response rate and timeliness of its statistical reports and relieve a very large burden on its staff. Mandates underlining the protection of privacy of personal data would be helpful as well. Authorization for technical assistance to respondents would be highly constructive.

7. Annual Data Acquisition Plan.

The Commissioner's statement speaks of his Annual Data Acquisition Plan, which is "publicly available as the official guide to planned data collection for the fiscal year." Yet it is not listed in the "Projects, Products, and Services of NCES." How is the public informed that these plans are publicly available? Please provide copies of recent plans.

While the data plan has been "publicly available" for the past three years, specific efforts to disseminate copies have been limited primarily to informing survey respondents. The primary distribution has been to the Council of Chief State School Officers and to State coordinators for the CCSSO Committee on Evaluation and Information Systems, who are actively involved in the review of OE data collection plans. These representatives have in turn been responsible for notifying appropriate local agency respondents of survey activities which will affect them. It is also mailed to Regional Commissioners of Education to enable them to handle inquiries concerning OE data collection. The Data Acquisition Plan is the product of an OE-wide Task Force (in 1974, NCES accounts for only 9% of the OE data collection) and was not considered to be an NCES product; therefore, it was not included in "Products, Products, and Services of NCES." It will be included in the next version with appropriate credit to the Task Force.

8. Common Core of Data (CCD) Program.

The Commissioner places great emphasis on the CCD Program in his statement of May 7. What is the current status of this program? Are interim or progress reports available? Please provide these as well as copies of any contractor's proposals for CCD that have been awarded funding.

The Common Core of Data Program currently consists of five components designed to improve educational statistics services at the Federal level:

1. An Educational Data Base (EDSTAT) accessible by remote computer terminals.
2. Improved analysis capability
3. Fast Response Surveys
4. Surveys of Educational Target Groups, the first survey to be in the 17–25 year old population; the second survey to be in the 5–17 year old population.
5. Federal Cores of Data about Elementary-Secondary and Post-secondary Education.

Significant developments have taken place on three components during the last year.

EDSTAT

Acquired and made operational the Data Base Used by the Commission on Financing Postsecondary Education.[1]

Developed request for proposals[2] and will award by June 30 a contract to perform systems requirements analysis for total EDSTAT. Developed request for proposals[3] and will award by June 30 a contract to edit and standardize more than 200 existing tapes. (Please see also for greater detail the response to question 1.)

SURVEY OF EDUCATIONAL TARGET GROUPS IN THE 17–25 YEAR OLD POPULATION

The survey will measure access, participation and success rates in postsecondary education programs, identify inequalities in these rates by target group and determine public expectations of and attitudes toward education. The pilot survey to test the study design is presently being conducted by the Census Bureau.[4] The design of the pilot has been based on assessment of need for the project and definition of data to be collected. Data tapes from the pilot survey will be available early in 1975; the results will be used to design the full scale population survey.

FEDERAL CORES OF DATA ABOUT ELEMENTARY SECONDARY AND POSTSECONDARY EDUCATION

In September 1973 Commissioner Ottina appointed OE-wide Task Forces responsible for specifying the recurring educational statistical data requirements of the Federal government.

The Task Force for Elementary-Secondary Education has been working throughout the year with NCES and its contractor to complete this assignment. A proposed data base for Elementary-Secondary Education has been developed.[5]

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[1] Task Statement, "Postsecondary Traditional Institutions Data Base" and accompanying Purchase Service Stock Requisitions for maintenance of data base and related activities.

[2] Work Statement, "Design of Educational Statistics Information Access System."

[3] Work Statement, "EDSTAT Standardization."

[4] Work Statement and Official Cost Estimate and Acceptance of the Pilot "Survey of Educational Target Groups in the 17-25 Year Old Population."

A feasibility study to determine the ability of State and local educational agencies to respond to the proposed Elementary-Secondary Federal core requirements has been designed.[6] Twenty-five States have volunteered to participate in the on-site phases of the study; the remaining States will complete their own assessments to determine the extent to which they will be able to meet OE data requirements in accordance with prescribed definition and quality standards and the costs which will be involved in providing required data. The findings of this study will be used to develop the first version of the Elementary-Secondary Federal data core.

At the postsecondary level,[7] work is currently underway to define the issues and the data required to address the issues. This study will be completed in the fall of 1974 and will lead to detailed specification of the data base for postsecondary education.

Work on the Fast Response and Analysis components is scheduled and budgeted to be undertaken in FY 1975.

A planning effort was conducted under contract in FY 73 to develop a detailed schedule of activities for the long term Common Core of Data program. The resulting report [8] outlined a comprehensive program for the Common Core of Data has, as a matter of phased development, been narrowed for the present to the Federal Core program described herein.

The voluminous working materials identified by reference numbers above, are enclosed. They include:

9. *Contracting Major Educational Surveys.*

9a. *There is some concern about the proportion of work done in-house by NCES and the extent of contracting of major educational surveys. Please provide details about the following surveys and projects: Higher Education General Information Survey; Elementary Secondary General Information Survey (LEA parts only); Consolidated Program Information Report; Statistical Survey of Elementary Schools; Secondary School Survey; Census Mapping Project; Common Core of Data for the Seventies; National Assessment of Educational Progress; Longitudinal Study of Educational Effects; School Universe File; Anchor Test.*

Please describe for each of these projects: For which of the past five years were data collected? What was the size of the sample or universe? When were preliminary summaries of the findings made available to the public? When were computer tapes containing all the data made available to the public? When were final versions of the data printed and made available?

When appropriate, please describe the proportion of NCES and contract work for each of these projects for: assessment of needs for the project; feasibility studies for the project; definition of data to be collected; design of the questionnaires; pre-testing of the questionnaires; data analysis plans; full-scale implementation of the survey; post-survey evaluation and validity studies; editing and management of the collected data; analysis of the data; specifications for publication of the data

Please provide the amount of contractual funding for each portion of these projects. If different contractors were used for separate phases of a single project or survey, please indicate the extent of the division of work.

The tables which follow, display the information requested above for each survey and project. Note that the Elementary Secondary General Information Survey, (ELSEGIS) and the Higher Education General Information Survey (HEGIS) are general titles which apply to a system of surveys composed of a varying number of parts or schedules which are separately reported in the tables. The 1969–70 School Universe was conducted as a separate survey but since then has been part of the ELSEGIS System. Where a table shows a percentage for the "proportion of NCES work on", but the percentage shown is less than 100%, it can be assumed that the remaining effort was performed by contract.

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[5] Volume I Technical proposal, "For the Development of the Federal Core of Data Elements for the Elementary/Secondary Sector."

Report entitled, "The Analysis of Issues and Information Requirements For Design of the Federal Statistical Core."

Report entitled "Definition of The Federal Core of Statistical Data For The Elementary/Secondary Sector."

[6] Contractors Technical Proposal, "Design and Conduct Of A Feasibility Study and Development of Instrumentation-Secondary Federal Data Core.

[7] Contractor's Technical Proposal, "Issues Determination and Data Category Delineation for Post Secondary Federal Core of Data Programs."

[8] Volume 1 Summary and Overview, "Common Core Of Data For the Seventies Operational Planning Materials." The more comprehensive and voluminous volumes II and III can be made available if desired.

HEGIS ACADEMIC LIBRARIES

Years data collected in past 5 years	IV 1969–70	V 1970–71	VI 1971–72	VII 1972–73	VIII 1973–74
Size of sample or universe	2, 826	(1)	2, 855	(1)	2, 951
When were the following made available to the public:					
Preliminary summary	(2)		(2)		(3)
Computer tapes	9/71		6/72		(3)
Final version printed	8/70		5/72		(3)
Proportion of NCES work on:					
Assessment of need (percent)	100		100		85
Feasibility studies	(4)		(4)		(4)
Definition of data	100		100		100
Design of questionnaires	100		100		100
Pretesting questionnaires	(4)		(4)		(4)
Data analysis plans	100		100		100
Full scale implementation	100		100		100
Postsurvey evaluation and validity	(4)		(4)		(4)
Editing and management of data	100		20		20
Analysis of data	100		90		90
Specs for publication	100		70		50
Contractual funding (in thousands of dollars):					
Assessment of need			[5] 35		[6] 10
Editing and management of data			[5] 40		[6] 38
Analysis of data			[6] 10		[6] 10
Specs for publication					[6] 9

[1] Not collected.
[2] Not done.
[3] Not yet completed.
[4] Not necessary.
[5] 1 contractor.
[6] 4 different contractors.

HEGIS ADULT EDUCATION

Years data collected in past 5 years	IV 1968–69	V 1969–70	VI 1970–71	VII 1971–72	VIII 1972–73
Size of sample or universe	(1)	(1)	1, 000	(1)	(1)
When were the following made available to the public:					
Preliminary summary			(2)		
Computer tapes			(2)		
Final version printed			(2) (3)		
Proportion of NCES work on:					
Assessment of need (percent)	(1)	(1)	100	(1)	(1)
Feasibility studies	(1)	(1)	(4)	(1)	(1)
Definition of data	(1)	(1)	100	(1)	(1)
Design of questionnaires	(1)	(1)	100	(1)	(1)
Pretesting questionnaires	(1)	(1)	100	(1)	(1)
Data analysis plans	(1)	(1)	100	(1)	(1)
Full scale implementation	(1)	(1)	100	(1)	(1)
Postsurvey evaluation and validity	(1)	(1)	0	(1)	(1)
Editing and management of data	(1)	(1)	50	(1)	(1)
Analysis of data	(1)	(1)	(2)	(1)	(1)
Specs for publication	(1)	(1)	70	(1)	(1)
Contractual funding (in thousands of dollars):					
Postsurvey evaluation and validity	(1)	(1)	[5] 83	(1)	(1)
Editing and management of data	(1)	(1)	[6] 27	(1)	(1)
Analysis of data	(1)	(1)	[6] 11	(1)	(1)
Specs for publication	(1)	(1)	[6] 40	(1)	(1)

[1] Not collected.
[2] Not done.
[3] Project abandoned before completion.
[4] Not necessary.
[5] 2 different contractors; both different from contractor designated by footnote 6.
[6] 1 contractor.

HEGIS EARNED DEGREES

Years data collected in past 5 years	IV 1968-69	V 1969-70	VI 1970-71	VII 1971-72	VIII 1972-73
Size of sample or universe	2,826	2,841	2,855	2,902	2,951
When were the following made available to the public:					
Preliminary summary	9/70	8/71	(1)	(1)	(1)
Computer tapes	11/71	6/72	2/73	(2)	(2)
Final version printed	3/71	11/71	9/73	(2)	(2)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	70	50
Feasibility studies	(3)	(3)	[4] 90	(3)	(3)
Definition of data	100	(3)	[4] 90	(3)	(3)
Design of questionnaires	100	100	100	(3)	(1)
Pretesting questionnaires	(3)	(3)	(3)	(3)	100
Data analysis plans	100	100	100	(3)	(3)
Full scale implementation	100	100	100	100	100
Postsurvey evaluation and validity	100	100	100	100	40
Editing and management of data	(1)	(1)	(1)	(1)	(5)
Analysis of data	100	100	100	20	20
Specs for publication	100	100	90	100	95
	100	100	60	50	50
Contractural funding (in thousands of dollars):					
Assessment of need				[6] 5	[7] 11
Editing and management of data				[6] 24	[7] 35
Analysis of data			[8] 5	[6] 9	[7] 4
Specs for publication			[8] 10	[6] 6	[7] 9

[1] Not done.
[2] Not yet completed.
[3] Not necessary.
[4] Development of taxonomy and field review.
[5] Planned.
[6] 4 different contractors.
[7] 4 different contractors.
[8] 2 different contractors.

HEGIS EMPLOYEES

Years data collected in past 5 years	IV 1969-70	V 1970-71	VI 1971-72	VII 1972-73	VII 1973-74
Size of sample or universe	2,841	2,855	2,902	2,951	(1)
When were the following made available to the public:					
Preliminary summary	(2)	(2)	(2)	2/73	(1)
Computer tapes	(3)	7/73	(4)	(4)	(1)
Final version printed	(3)	(3)	(4)	(4)	(1)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	70	(1)
Feasibility studies	(5)	(5)	(5)	(5)	(1)
Definition of data	(5)	(5)	(5)	(5)	(1)
Design of questionnaires	100	100	100	100	(1)
Pretesting questionnaires	(5)	(5)	(5)	100	(1)
Data analysis plans	100	100	100	100	(1)
Full scale implementation	100	100	40	100	(1)
Postsurvey evaluation and validity	ND	50	(2)	(2)	(1)
Editing and management of data	20	20	20	20	(1)
Analysis of data	100	90	90	90	(1)
Specs for publication	100	75	60	50	(1)
Contractual funding (in thousands of dollars):					
Assessment of need				[9] 5	(1)
Postsurvey evaluation and validity		[6] 40			
Editing and management of data	30	[6] 25	[7] 53	[9] 25	(1)
Analysis of data		[6] 12	[7] [8] 38	[9] 19	(1)
Specs for publication		[6] 12	[7] 10	[9] 9	(1)

ID = Incomplete Dropped
NN = Not Necessary
ND = Not Done
NYC = Not Yet Complete
NC = Not Collected

[1] Not collected.
[2] Not done.
[3] Incomplete, dropped.
[4] Not yet complete.
[5] Not necessary.
[6] 4 different contractors.
[7] 3 different contractors.
[8] Contractor went bankrupt; redone by GSA.
[9] 4 different contractors.

HEGIS Finance

	IV	V	VI	VII	VIII
Years data collected in past 5 years	1968-69	1969-70	1970-71	1971-72	1972-73
Size of sample or universe	2, 826	2, 841	2, 855	2, 902	2, 951
When were the following made available to the public:					
Preliminary summary	(1)	(1)	(1)	4/73	5/74
Computer tapes	7/73	7/73	7/73	5/74	(2)
Final version printed	6/71	10/73	(2)	(1)	(2)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	70	50
Feasibility studies	(3)	(3)	(3)	(3)	(3)
Definition of data	100	(3)	(2)	(2)	(3)
Design of questionnaires	100	100	100	100	100
Pretesting questionnaires	(3)	(3)	(3)	(3)	(3)
Data analysis plans	100	100	100	100	100
Full scale implementation	100	100	40	100	40
Postsurvey evaluation and validity	(1)	50	(1)	(1)	(1)
Editing and management of data	100	20	100	20	20
Analysis of data	100	100	100	90	95
Specs for publication	100	75	60	50	50
Contractual funding (in thousands of dollars):					
Assessment of need				[4] 5	[4] 11
Postsurvey evaluation and validity		[5] 115			
Editing and management of data		[5] 9	[6] 45	[4] 20	[4] 45
Analysis of data				[4] 10	[4] 4
Specs for publication		[5] 12	[6] 10	[4] 5	[4] 9

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[1] Not done.
[2] Not yet completed.
[3] Not necessary.
[4] 4 different contractors.
[5] 3 different contractors.
[6] 2 different contractors.

HEGIS INSTITUTIONAL CHARACTERISTICS

	IV	V	VI	VII	VIII
Years data collected in past 5 years	1969-70	1970-71	1971-72	1972-73	1973-7
Size of sample or universe	2, 841	2, 855	2, 902	2, 951	3, 018
When were the following made available to the public:					
Preliminary summary	(1)	(1)	(1)	(1)	(1)
Computer tapes	4/73	12/71	12/71	10/72	5/74
Final version printed	7/70	3/71	3/72	12/72	3/74
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	70	50
Feasibility studies	(2)	(2)	(2)	(2)	(2)
Definition of data	(2)	(2)	(2)	(2)	(2)
Design of questionnaires	(2)	(2)	100	(2)	100
Pretesting questionnaires	(2)	(2)	(2)	(2)	(2)
Data analysis plans	(3)	(3)	100	100	100
Full scale implementation	100	100	100	100	100
Postsurvey evaluation and validity	(2)	(2)	(2)	(2)	(2)
Editing and management of data	100	100	100	100	100
Analysis of data	100	100	100	100	100
Specs for publication	100	100	90	90	90
Contractual funding (in thousands of dollars):					
Assessment of need				[4] 5	[4] 11
Specs for publication			10	[4] 9	[4] 9

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[1] Not applicable.
[2] Not necessary.
[3] Not done.
[4] 2 different contractors.

HEGIS OPENING FALL ENROLLMENT

Years data collected in past 5 years	IV 1969–70	V 1970–71	VI 1971–72	VII 1972–73	VIII 1973–74
Size of sample or universe	2,841	2,855	2,902	2,951	3,018
When were the following made available to the public:					
Preliminary summary	10/70	6/71	(1)	12/72	1/74
Computer tapes	9/71	6/72	6/72	7/73	(2)
Final version printed	8/71	10/71	8/73	(2)	(2)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	70	50
Feasibility studies	(3)	(3)	(3)	(3)	(3)
Definition of data	(3)	(3)	(3)	(3)	(3)
Design of questionnaires	100	100	100	100	100
Pretesting questionnaires	(3)	(3)	(3)	(3)	(3)
Data analysis plans	100	100	100	100	100
Full scale implementation	100	100	100	100	40
Postsurvey evaluation and validity	(1)	(1)	(1)	(1)	(4)
Editing and management of data	100	100	100	100	20
Analysis of data	100	100	90	90	95
Specs for publication	100	100	60	50	50
Contractual funding (in thousands of dollars)	$(000)	$(000)	$(000)	$(000)	$(000)
Assessment of need				[5] 5	[6] 11
Editing and management of data					[6] 33
Analysis of data			[7] 21	[5] 31	[6] 5
Specs for publication			[7] 10	[5] 4	[6] 9

[1] Not done.
[2] Not yet completed.
[3] Not necessary.
[4] Planned.
[5] 3 different contractors.
[6] 4 different contractors.
[7] 2 different contractors.

HEGIS PHYSICAL FACILITIES

Years data collected in past 5 years	IV 1969–70	V 1970–71	VI 1971–72	VII 1972–73	VIII 1973–74
Size of sample or universe	2,841	2,835	2,902	(1)	(1)
When were the following made available to the public:					
Preliminary summary	(2)	(2)	(2)	(1)	(1)
Computer tapes	6/72	5/73	8/73	(1)	(1)
Final version printed	12/72	(3)	4/73	(1)	(1)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	(1)	(1)
Feasibility studies	(4)	(4)	(4)	(1)	(1)
Definition of data	100	(4)	(4)	(1)	(1)
Design of questionnaires	100	100	100	(1)	(4)
Pretesting questionnaires	100	(4)	(4)	(1)	(1)
Data analysis plans	100	100	100	(1)	(1)
Full scale implementation	100	50	50	(1)	(1)
Postsurvey evaluation and validity	(2)	0	0	(1)	(1)
Editing and management of data	100	0	0	(1)	(1)
Analysis of data	100	100	80	(1)	(1)
Specs for publication	100	90	90	(1)	(1)
Contractual funding (in thousands of dollars):					
Full scale implementation		[3] 15	[3] 15	(1)	(1)
Postsurvey evaluation and validity		[3] 30	[3] 30	(1)	(1)
Editing and management of data		[3] 75	[3] 65	(1)	(1)
Specs for publication		28	5	(1)	(1)

[1] Not collected.
[2] Not done.
[3] Not yet completed.
[4] Not necessary.

HEGIS RESIDENCE AND MIGRATION

Years data collected in past 5 years	IV 1969-70	V 1970-71	VI 1971-72	VII 1972-73	VIII 1973-74
Size of sample or universe	(1)	(1)	(1)	2,951	(1)
When were the following made available to the public:					
Preliminary summary	(1)	(1)	(1)	(2)	(1)
Computer tapes	(1)	(1)	(1)	(2)	(1)
Final version printed	(1)	(1)	(2)	(2)	(1)
Proportion of NCES work on:					
Assessment of need (percent)	(1)	(1)	(1)	70	(1)
Feasibility studies	(1)	(1)	(1)	(3)	(1)
Definition of data	(1)	(1)	(1)	(3)	(1)
Design of questionnaires	(1)	(1)	(1)	100	(1)
Prestesting questionnaires	(1)	(1)	(1)	(3)	(1)
Data analysis plans	(1)	(1)	(1)	100	(1)
Full scale implementation	(1)	(1)	(1)	100	(1)
Postsurvey evaluation and validity	(1)	(1)	(1)	(4)	(1)
Editing and management of data	(1)	(1)	(1)	100	(1)
Analysis of data	(1)	(1)	(1)	90	(1)
Specs for publication	(1)	(1)	(1)	50	(1)
Contractual funding (in thousands of dollars):					
Assessment of need	(1)	(1)	(1)	[5] 5	(1)
Analysis of data	(1)	(1)	(1)	[5] 25	(1)
Specs for publication	(1)	(1)	(1)	[5] 11	(1)

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[1] Not collected.
[2] Not yet complete.
[3] Not necessary.
[4] Not done.
[5] 3 different contractors.

HEGIS STUDENTS ENROLLED FOR ADVANCED DEGREES

Years data collected in past 5 years	IV 1969-70	V 1970-71	VI 1971-72	VII 1972-73	VIII 1973-74
Size of sample or universe	907	926	947	1,008	1,029
When were the following made available to the public:					
Preliminary summary	9/70	9/71	(1)	(1)	(1)
Computer tapes	7/71	6/73	6/73	(2)	NYC
Final version printed	8/71	11/71	(2)	(2)	(2)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	70	50
Feasibility studies	(3)	(3)	(4)	(3)	(3)
Definition of data	100	(3)	[4] 90	(3)	(3)
Design of questionnaires	100	100	100	100	100
Pretesting questionnaires	(3)	(3)	(3)	(3)	(3)
Data analysis plans	100	100	100	100	100
Full scale implementation	100	100	100	20	40
Postsurvey evaluation and validity	(1)	(1)	(1)	(1)	(5)
Editing and management of data	100	100	100	20	20
Analysis of data	100	100	100	100	95
Specs for publication	100	100	60	50	50
Contractual funding (in thousands of dollars):					
Assessment of need				(5)	[6] 11
Feasibility studies			(7)		
Definition of data			(7)		
Full scale implentation				[8] 5	[8] 5
Editing and management of data				[6] 15	[8] 25
Specs for publication			10	[6] 6	[8] 8

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[1] Not done.
[2] Not yet complete.
[3] Not necessary.
[4] Development of taxonomy and field review.
[5] Planned.
[6] 2 different contractors and different from contractor designated by footnote 8.
[7] Small sums; personal services contract.
[8] Same contractor.

ELSEGIS: LEA FINANCE

	II	III	IV	V	VI
Years data collected past 5 years	1968-69	1969-70	1970-71	1971-72	1972-73
Size of sample or universe	1,775	5,200	2,600	2,543	934
When were the following made available to the public:					
Preliminary summary	(1)	(1)	(1)	(1)	(1)
Computer tapes	8/73	10/72	9/73	(2)	(2)
Final version printed	6/71	(2)	(2)	(2)	(2)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	100	100
Feasibility studies	(3)	(3)	(3)	(3)	(2)
Definition of data	(3)	(3)	(2)	(4)	(3)
Design of questionnaires	100	100	100	100	100
Pretesting questionnaires	(3)	(3)	(3)	(3)	(3)
Data analysis plans	100	75	50	100	100
Full scale implementation	100	100	100	100	100
Postsurvey evaluation and validity	(1)	(1)	(1)	(1)	(1)
Editing and management of data	100	100	100	100	25
Analysis of data	100	50	50	80	100
Specs for publication	100	50	100	100	100
Contractual funding (in thousands of dollars):					
Data analysis plans		[4] 30	[5] 80		
Postsurvey evaluation and validity				[5] 95	
Editing and management of data					30
Analysis of data		[4] 30	[5][4] 10	[5] 13	
Specs for publication		[4] 30			

[1] Not done.
[2] Not yet complete.
[3] Not necessary.
[4] 1 contractor—also see ELSEGIS III: LEA staff and pupils for same contractor.
[5] 2 different contractors.
[6] Table programs to be used for ELSEGIS V and VI, as well.

ELSEGIS: LEA STAFF AND PUPILS

	II	III	IV	V	VI
Years data collected in past 5 years	1969-70	1970-71	1971-72	1972-73	1973-74
Size of sample or universe	1,775	5,200	2,600	(1)	(2)
When were the following made available to the public:					
Preliminary summary	(3)	(3)	(3)	(1)	(2)
Computer tapes	8/73	8/72	8/73	(1)	(2)
Final version printed	10/71	8/73	(4)	(1)	(2)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	(1)	(2)
Feasibility studies	(5)	(5)	(5)	(1)	(2)
Definition of data	(5)	(5)	(5)	(1)	(2)
Design of questionnaires	100	100	100	(1)	(2)
Pretesting questionnaires	(5)	(5)	(5)	(1)	(2)
Data analysis plans	100	75	100	(1)	(2)
Full scale implementation	100	100	100	(1)	(2)
Postsurvey evaluation and validity	(3)	(3)	(3)	(1)	(2)
Editing and management of data	100	100	100	(1)	(2)
Analysis of data	100	50	80	(1)	(2)
Specs for publication	100	50	100	(1)	(2)
Contractual funding (in thousands of dollars):					
Data analysis plans		[6] 25		(1)	(2)
Analysis of data		[6] 25	5	(1)	(2)
Specs for publication		[6] 25		(1)	(2)

[1] Not collected.
[2] Survey conducted by Equal Employment Opportunities Commission.
[3] Not done.
[4] Not yet completed.
[5] Not necessary.
[6] 1 contractor—also see ELSEGIS III: LEA finance for same contractor.

CONSOLIDATED PROGRAM INFORMATION REPORT

Years data collected in past 5 years	1969-70	1970-71	1971-72	1972-73	1973-74
Size of sample or universe (LEA's)	4,457	4,425	3,468	2,888	(1)
When were the following made available to the public:					
Preliminary summary	(2)	(2)	(3)	(3)	(1)
Computer tapes	(2)	(2)	(3)	(3)	(1)
Final version printed	(2)	(2)	(3)	(3)	(1)
Proportion of NCES work on:[4]					
Assessment of need (percent)	70	100	100	100	(1)
Feasibility studies	20	(5)	(5)	(5)	(1)
Definition of data	100	(6)	90	60	(1)
Design of questionnaires	85	(5)	50	50	(1)
Pretesting questionnaires	(4)	(5)	(6)	(6)	(1)
Data analysis plans	10	10	40	(7)	(1)
Full scale implementation	5	10	10	50	(1)
Postsurvey evaluation and validity	(6)	15	25	(7)	(1)
Editing and management of data	5	5	10	10	(1)
Analysis of data	10	10	50	(7)	(1)
Specs for publication	10	10	100	(7)	(1)
Contractual funding: (in thousands of dollars):					
Assessment of need	8	------	------	------	(1)
Feasibility studies	15	------	------	------	(1)
Definition of data	------	------	2	5	(1)
Design of questionnaires	5	1	4	5	(1)
Data analysis plans	15	25	35 35	21 30	(1)
Full-scale implementation	31	35	[8] 242	[9] 125	(1)
Postsurvey evaluation and validity	------	[10] 66	5	------	(1)
Editing and management of data	241	312	221 8	166 22	(1)
Analysis of data	23	16	[11] 14	[12] 24	(1)
Specs for publication	2	------	------	------	(1)

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[1] Not collected.
[2] Not available to public.
[3] Not yet completed.
[4] Includes other OE in-house.
[5] Not necessary.
[6] Not done.
[7] Planned.
[8] 41 separate state grants.
[9] 34 separate state contracts.
[10] Different contractor.
[11] 3 different software maintenance contracts.
[12] 4 different software maintenance contracts.

Years data collected in past 5 years	1969-70	1970-71	1973-74 Pretest
Size of sample or universe schools	[1] 4,000	[2] 4,000	[3] 100
When were the following made available to the public:			
Preliminary summary	(4)	(5)	(5)
Computer tapes	(4)	(5)	(5)
Final version printed	(4)	(5)	(5)
Proportion of NCES work on:			
Assessment of need	100	100	70
Feasibility studies	40	40	10
Definition of data	100	100	100
Design of questionnaires	60	50	70
Pretesting questionnaires	20	20	10
Data analysis plans	50	50	60
Full scale implementation	50	50	NA
Postsurvey evaluation and validity	50	70	30
Editing and management of data	50	50	10
Analysis of data	50	60	(7)
Specs for publication	(6)	(6)	(6)
Contractual funding (in thousands of dollars):			
Assessment of need			25
Feasibility studies			25
Definition of data			10
Design of questionnaires	20	20	50
Pretesting questionnaires	22		40
Data analysis plans			20
Full-scale implementation	80	80	
Postsurvey evaluation and validity	20	20	70
Editing and management of data	142	154 [8] 6	20
Analysis of data	[9] 245	100	33

In 821 school districts: 30,000 teachers; 90,000 pupils.

[2] In 803 school districts: 30,000 teachers; 90,000 pupils.

[3] In 50 school districts: 700 teachers; 1,600 pupils.

[4] Not available to public.

[5] Not yet completed.

[6] Not applicable.

[7] Planned.

[8] Different contractor.

[9] 2 different contractors.

SECONDARY SCHOOL SURVEY

Years data collected in past 5 years	Design effort only
Size of sample or universe	([1])
When were the following made available to the public:	
Preliminary summary	([1])
Computer tapes	([1])
Final version printed	([1])
Proportion of NCES work on:	
Assessment of need	100
Feasibility studies	100
Definition of data	75
Design of questionnaires	75
Pretesting questionnaires	65
Data analysis plans	75
Full scale implementation	([2])
Postsurvey evaluation and validity	([2])
Editing and management of data	([2])
Analysis of data	([2])
Specs for publication	([2])
Contractual funding (in thousands of dollars):	
Assessment of need	
Definition of data	150
Design of questionnaires	74
Pretesting questionnaires	100
Data analysis plans	75

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[1] Design effort only.
[2] Not applicable.

CENSUS MAPPING

Years data collected in past 5 years	School district 1st count, April 1970 [1]	School district 4th count, April 1970 [2]	Census/ ELSEGIS, April 1970 [2]
Size of sample or universe	12,000	12,000	4,900
When were the following made available to the public:			
Preliminary summary	([3])	([3])	([3])
Computer tapes	6/72	3/73	8/73
Final version printed	([3])	([4])	([4])
Proportion of NCES work on:			
Assessment of need (percent)	100	100	100
Feasibility studies	20	([3])	([3])
Definition of data	100	100	100
Design of questionnaires	([5])	([5])	([5])
Pretesting questionnaires	([5])	([5])	([5])
Data analysis plans	90	80	90
Full scale implementation	([5])	([5])	([5])
Postsurvey evaluation and validity	([3])	([3])	([3])
Editing and management of data	([5])	([5])	([5])
Analysis of data	10	20	20
Specs for publication	80	100	100
Contractual funding (in thousands of dollars):			
Feasibility studies	10		
Data analysis plans	5	5	5
Analysis of data	108	87	20
Specs for publication	10		

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[1] 3 contractors.
[2] 1 contractor.
[3] Not done.
[4] Not yet completed.
[5] Not needed.

Note.—Map completion, $125,000; development of reference tape, $300,000.

COMMOM CORE OF DATA

Question 9	Elementary/ Secondary Federal data core	Postsecondary Federal data core	Population survey: May 1974
Years data collected on past 5 years	(1)	(1)	(2)
Size of sample or universe	(1)	(1)	14, 500
When were the following made available to the public:			
Preliminary summary	(1)	(1)	(3)
Computer tapes	(1)	(1)	(3)
Final version printed	(1)	(1)	(3)
Proportion of NCES work on:			
Assessment of need	100	100	100
Feasibility studies	50	(3)	0
Definition of data	75	50	100
Design of questionnaires	25	(3)	50
Pretesting questionnaires	25	(3)	(4)
Data analysis plans	(3)	(3)	100
Full scale implementation	(3)	(3)	0
Postsurvey evaluation and validity	(3)	(3)	(4)
Editing and management of data	(3)	(3)	(3)
Analysis of data	(3)	(3)	(3)
Specs for publication	(3)	(3)	(3)
Contractual funding (in thousands of dollars):			
Assessment of need	[5,6] 100		
Feasibility studies	[7] 47	30	
Definition of data	[5] 45		
Design of questionnaires	[5] 20 [5] 20		30
Pretesting questionnaires	[7] 40	10	
Data analysis plans			10
Full-scale implementation			253

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[1] Not applicable.

[2] Not yet completed.

[3] Planned.

[4] Not necessary.

[5] Same contractor.

[6] NCES plans additional funds for this phase ($6,500).

[7] Different contractor from contractor designated in footnote 1e.

NATIONAL ASSESSMENT OF EDUCATIONAL PROGRESS

Years data collected in past 5 years	1969-70	1970-71	1971-72	1972-73	1973-74
Size of sample or universe [1]	110,000	110,000	110,000	110,000	110,000
When were the following made available to the public:					
Preliminary summary	(2)	(2)	(2)	(2)	(2)
Computer tapes [3]					
Final version printed [4]	12/70	12/71	12/72	(5)	(5)
Proportion of NCES work on: [6]					
Assessment of need				5	
Feasibility studies				5	
Definition of data				10	
Design of questionnaires				10	
Pretesting questionnaires				5	
Data analysis plans				20	
Full scale implementation				5	
Postsurvey evaluation and validity				5	
Editing and management of data				5	
Analysis of data				20	
Specs for publication				10	
Contractual funding [7] (in thousands of dollars):					
Assessment of need				(8)	
Feasibility studies				74	
Definition of data				132	
Design of questionnaires				587	
Pretesting questionnaires				171	
Data analysis plans				151	
Full-scale implementation				3,185	
Postsurvey evaluation and validity				284	
Editing and management of data				396	
Analysis of data				469	
Specs for publication				280	

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[1] Approximate sample size for four age groups assessed each year—

Age:	Sample size
9	28,000
13	39,000
17	39,000
Adults (26-35)	4,000

[2] Not applicable.

[3] First tapes will be available in early fiscal year 1975.

[4] Data shown is for the first report released, others followed within a year's time. Summary of numbers released is as follows: 1969-70—science 3, citizenship 3, writing 5; 1970-71—literature 6, reading 11; 1971-72—music 2, social studies 1.

[5] Not yet completed.

[6] Shown is the distribution of NCES staff work rather than proportion of NCES to contract work. The two (plus) professionals in NCES monitor the activities of the NAEP staff of 25 professionals.

[7] Shown is the distribution of contract funding for fiscal year 1973, as being more typical of budget breakdowns than other years.

[8] Not necessary.

NATIONAL LONGITUDINAL STUDY OF THE HIGH SCHOOL CLASS OF 1972

Years data collected in past 5 years	Base year, 1971-72[1]	First followup, 1973-74[2]	Field test, second followup, 1973-74[3] [4]
Size of sample or universe	21,600	23,000	900
When were the following made or available to the public:			
Preliminary summary	4/74	(5)	(6)
Computer tapes	(7)	(5)	(6)
Final version printed	(7)	(5)	(6)
Proportion of NCES work on:			
Assessment of need (percent)	70	100	100
Feasibility studies	0	(8)	(8)
Definition of data	100	100	100
Design of questionnaires	70	50	50
Pretesting questionnaires	0	0	0
Data analysis plans	50	50	50
Full scale implementation	0	0	(8)
Postsurvey evaluation and validity	20	20	20
Editing and management of data	0	0	0
Analysis of data	20	10	10
Specs for publication	100	100	(8)
Contractual funding (in thousands of dollars):			
Assessment of need	42		
Feasibility studies	142		
Design of questionnaires	47	60	38
Pretesting questionnaries	169	80	36
Data analysis plans	38	28	5
Full-scale implementation	215	1,014	
Postsurvey evaluation and validity	151	20	1
Editing and management of data	293	93	4
Analysis of data	165	132	25

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[1] 3 different contractors.
[2] 2 different contractors.
[3] 1 contractor.
[4] Field test only.
[5] Planned.
[6] Not available to public.
[7] Not yet completed
[8] Not necessary.

ELSEGIS SCHOOL UNIVERSE FILE

Years data collected in past 5 years	II 1969-70	III 1970-71	IV 1971-72	V 1972-73	VI 1973-74
Size of sample or universe	95,000	95,000	95,000	95,000	(1)
When were the following made available to the public:					
Preliminary summary	(2)	(2)	(2)	(2)	(1)
Computer tapes	1/73	1/73	1/73	(3)	(1)
Final version printed	(4)	(4)	(4)	(4)	(1)
Proportion of NCES work on:					
Assessment of need (percent)	100	100	100	100	(1)
Feasibility studies	(5)	(5)	(5)	(5)	(1)
Definition of data	(5)	(5)	(5)	(5)	(1)
Design of questionnaires	100	100	100	100	(1)
Pretesting questionnaires	(5)	(5)	(5)	(5)	(1)
Data analysis plans	100	100	100	100	(1)
Full scale implementation	100	100	100	100	(1)
Postsurvey evaluation and validity	(5)	(5)	(5)	(5)	(1)
Editing and management of data	50	100	100	100	(1)
Analysis of data	100	100	100	75	(1)
Specs for publication	(2)	(2)	(2)	(2)	(1)
Contractual funding (in thousands of dollars):					(1)
Editing and management of data	56				(1)
Analysis of data				10	(1)

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[1] Not collected.
[2] Not applicable.
[3] Not yet completed.
[4] No publication planned; 1968-69 directory published.
[5] Not necessary.

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ANCHOR TEST (READING)

Years data collected in past 5 years	1972	1973
Size of sample or universe (schools)	1,654	80
When were the following made available to the public:		
Preliminary summary	([2])	([3])
Computer tapes	([3])	([4])
Final version printed	([4])	([4])
Proportion of NCES work on:		
Assessment of need	100	([1])
Feasibility studies	25	([1])
Definition of data	100	([1])
Design of questionnaires	10	([1])
Pretesting questionnaires	0	([1])
Data analysis plans	90	([1])
Full scale implementation	20	([1])
Postsurvey evaluation and validity	([5])	([1])
Editing and management of data	10	([1])
Analysis of data	10	([1])
Specs for publication	100	([1])
Contractual funding (in thousands of dollars):		
Assessment of need		([1])
Feasibility studies	[6] 57	[7] 13
Definition of data	6	
Design of questionnaires	10	
Pretesting questionnaires	1	
Data analysis plans	75	
Full-scale implementation	585	
Editing and management of data	70	
Analysis of data	230	[8] 71
Specs for publication	20	

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[1] A supplementary test was added in 1973 by the same contractor; proportion of work applies to both the 1972 and 1973 phases of the project.

[2] Unofficial version of users manual to CSSO's September 1973.

[3] Not necessary

[4] Not yet completed.

[5] Not applicable.

[6] Separate contract.

[7] Technical services contracts for evaluation of proposals and review of contractor products.

[8] Separate contract for special analyses.

9b. *Given the extent of contractual work on these and other NCES projects, please provide any additional information that would explain or clarify how NCES maintains the necessary skills and knowledge needed to propose and manage these projects effectively.*

As can be seen from the above tables NCES as a whole has performed and continues to perform every activity listed. Also, with a few exceptions and greatest amount of contractor activity occurs during the implementation and execution phases, while the plans and designs are largely formulated by NCES staff. Even in the cases where a contract is used for an activity, the NCES staff works very closely with the contractor's staff. Generally, contracts issued by NCES call for the contractor to submit draft products at various stages during the project to be reviewed by the NCES project monitor. These reviews not only rely on the monitor's knowledge and experience but on the expertise of others within NCES and OE and as appropriate on external consultants. This is a dynamic process through which the project monitor and other NCES staff continue to learn.

Of course, NCES does not deny the advantages of in-house activity. Given a choice many more activities would be performed in-house. In this connection, also see the response to question 13e below.

10a1. *How many surveys are conducted annually by NCES?*

During the past three fiscal years the number of surveys conducted by NCES and the total number of items are as follows:

Fiscal year:	
1974 (9,433,000 items)	34
1973 (12,269,000 items)	24
1972 (6,299,000 items)	27

The items shown above represent the number of questions responded to on each survey questionnaire multiplied by the number of respondents.

10a2. *Could you provide us with a list if the surveys made in the past three years including the number sampled, the number of questions asked, etc?*

A list of the surveys conducted during the past three years including the number of items, the number of respondents (which may be a sample or the universe) and the frequency follows: The respondents may be individuals, LIST OF SURVEYS CONDUCTED BY NCES IN THE LAST 4 YEARS

Title	Frequency	Fiscal year 1974		Fiscal year 1973		Fiscal year 1972	
		Items	Sample	Items	Sample	Items	Sample
HEGIS:							
Institutional characteristics of colleges and universities	Annual	118, 900	3, 000	113, 400	3, 000	93, 000	2, 900
Degrees and other formal awards conferred	do	810, 000	3, 200	783, 000	2, 900	783, 000	2, 700
Opening fall enrollment in higher education	do	99, 000	3, 000	156, 600	2, 900	156, 600	2, 900
Students enrolled for advanced degrees	do	125, 000	1, 150	112, 500	900	112, 500	900
Employees in institutions of higher education	As required	450, 000	3, 200			203, 000	2, 900
Financial statistics of institutions of higher education	Annual	120, 000	3, 200	145, 000	2, 900	165, 300	2, 900
Library collection and expenditures	Biennial					240, 000	2, 700
Inventory of college and university facilities	do	493, 600	3, 200			246, 500	2, 700
Survey of adult and continuing activities and institutions of higher education	do					75, 000	2, 572
Current population survey, schedule of adult education activities	do	208, 000	13, 000			650, 000	NA
Longitudinal study of the high school class of 1972 (pre-test and base)	1 time						
School Questionnaire, Students school record information:							
First followup survey	do			2, 219, 014	22, 643		
Second followup survey	do	63, 000	900				
Survey of programs and enrollments in noncollegiate postsecondary schools	do	350, 000	5, 000				
LIBGIS:							
Universe survey of public Libraries	Annual	13, 500	1, 500				
Public School Libraries	do	269, 500	3, 500				
ELSEGIS:							
LEA fall report on staff and pupils	1 time						
LEA fiscal report	Annual	201, 450	2, 550	201, 450	2, 550	237, 000	3, 000
Finances: School year 1969–70, validation study	1 time	7, 992	222				
Report on membership by grade for selected counties	Annual	2, 565	50	2, 736	58	2, 451	58
State fiscal report	do	4, 674	57	4, 350	58	2, 255	58
State fall report on public school housing	do	798	57	684	58	1, 140	58
Supplementary report for newly organized school systems	As required			204, 000	17, 000	36, 750	58
State fall estimates of expenditures and salary data for public schools	Annual	570	57	969	58	570	58
Survey of Public Secondary School offerings, enrollments, and curriculum practices.	Every 10 years	3, 896, 000	8, 000				
State elementary and secondary school statistics	Biannual	22, 230	57			31, 900	57
Media centerssur vey	Every few years						
Census of schools	As required			285, 000	94, 000	380, 000	95, 000
Small School Systems Report on Staff and Pupils	Annual						
Post survey check of HEGIS VI—adult continuing education education activities	1 time	32, 864	104				
Content of public television programing	Weekly	5, 635	161				
Elementary school survey	Annual	482, 050	1, 550				

LIST OF SURVEYS CONDUCTED BY NCES IN THE LAST 4 YEARS—Continued

Title	Frequency	Fiscal year 1974		Fiscal year 1973		Fiscal year 1972	
		Items	Sample	Items	Sample	Items	Sample
Consolidated program information report	do	654,000	2,700	500,000	4,000	625,000	4,000
National assessment tailsheet for age 9	do	135,600	22,600	143,880	NA		
National assessment tailsheet for age 13	do	194,600	27,800	202,860	NA		
National assessment tailsheet for age 17	do	248,000	31,000	231,840	NA		
National assessment tailsheet for seniors	do	78,400	9,800				
National assessment background questionnaire	do	40,000	5,000				
State summary of ESEA title I, program activities for regular school term 1973 and summer school term, 1973.	1-time	15,447	57				
State aggregated data supplement for ESEA title II and NDEA title III	do	6,324	51				
American Indians enrolled in public schools	do	10,200	51				
Longitudinal study of educational effects—early growth study tryouts	do	154,388	948				
Anchor test study	do			4,152,700	26,050		
Survey of characteristics of vocational education teachers, secondary and postsecondary students and adult students.	do			2,584,000	77,000		
Survey of adult education in the public education system	do					250,000	95,000
Program reference file	do			89,914	350		
LIBGIS demonstration project	do			1,178	181		
Survey of financial status of large city public elementary secondary school systems, and State summary data.	do			99,774	241	99,774	241
Consolidated program information report supplement A—neglected and delinquent.	Annual			18,225	45		
Consolidated program information report supplement B—Children of migratory workers.	1-time			16,900	650		
Women's barriers in continuing education	do					554,000	12,000
Vocational education directory, secondary postsecondary survey	Every 2 years					108,000	3,750
Survey of adult education in community organizations	1-time					880,850	10,438
Study of community junior colleges	do					15,000	1,500
Survey of public libraries and nonconsolidated public library systems serving areas with at least 25,000 inhabitants.	Every 3 years					6,705	300
Survey of library and information center statistics and data practices at the State, national, and local levels—pretest and interview.	1-time						
School staffing survey	do					343,000	7,000
Survey of nonpublic elementary and secondary education	Every 5 years						
Current population survey of college students	Occasional						

NA—Not available.

States, Institutions of Postsecondary Education, Libraries, Community organizations, etc. depending upon the survey design.

10a3. *How many additional surveys or data collections are made by other parts of the Education Division?*

During FY 74 there were 410 data collections conducted by other parts of the Office of Education categorized as follows:

Applications (includes program and student support applications)	123
Fiscal reports	56
State plans	3
Evaluations	19
Surveys/questionnaires	114
Program/project status and summary reports	81
Other (such as inventory reports, assurance, agreements, etc.)	14

10a4. *Who has central control over this to ensure that the same questions are not being asked several times of the same respondents by different offices?*

The Commissioner of January 11, 1971, established an OE-wide Task Force responsible for compiling a coordinated data plan for FY 1971 and subsequent years. The Commissioner's memorandum directed the Task Force, under the chairmanship of the Assistant Commissioner for Educational Statistics, to develop and review a coordinated plan "to minimize total response burden on any group of respondents, eliminate duplication of information, and assure orderly time-phasing of collections". The Data Acquisition Task Force, which includes representatives from each data-collecting Bureau and Office and the States, serves as a continuing instrument of coordination. The Council of Chief State School Officers established a technical Committee on Evaluation and Information Systems (CEIS), which has worked closely with the Task Force. A subcommittee of CEIS reviews each form proposed for inclusion in the OE Annual Data Collection Plan. Each sponsor must present his proposed survey to the subcommittee, which recommends inclusion or modification based on the capability to respond, and on possible use of surrogate data already available and the sponsor's justification of need for the data.

The effectiveness of this activity has been limited by the lack of full time personnel commitment and by the absence of mechanisms to examine individual data items. Recently, a new tool has been developed which will substantially improve the ability of OE to avoid duplication of data items. The new Forms File and Table Index permits automated retrieval of matrices of data items currently collected on all OE surveys included in the Annual Data Plan. Thus, it is now possible to pinpoint existing duplication, and to determine on any new requests for data whether the proposed item is already being collected.

In the long run, development of the data bases to be implemented under the Common Core of Data Program is specifically geared to designing a single, consolidated statistical data source for use by all units of the Office of Education. To this end, in September 1973 Commissioner Ottina appointed two OE-wide Task Forces responsible for ensuring that data for current policy issues and program planning, as well as the recurring statistical data needed by the various units for program operations, are addressed through the Common Core.

10b. *How many of the surveys conducted each year are annual or semiannual and how many are one of a kind. Could you provide us with examples of each?*

The distribution of NCES surveys by length of cycle is given below:

Length of cycle	Fiscal year—			
	1974	1973	1972	1971
Annual	20	15	12	9
Biennial	3	0	6	0
1 time	8	7	4	5
Other [1]	3	2	5	4

[1] Recurring surveys conducted either irregularly or at 3-year and greater intervals.

The list of surveys provided in response to question 10a2, identifies the frequency of collection of each survey.

10c–1 *How much time is involved between actual sampling and the publication of findings?*

It is assumed the time sought here is the period between the respondent due date and the date of publication of a first full report. For recurrent, relatively standard surveys, the turnaround time ranges from 8 months for directories to 38 months for surveys with low priorities (because of inadequate resources). The mean publication turnaround time is 22.4 months, with about one-half of the publications requiring between 17 and 27 months. If the turnaround time between the "as of" date of the data and the first full publication is desired, then the mean publication turnaround time increases to about 26 months.

10c–2 *Can you tell us something about the process involved?*

From the due date of the form to the publication of a manuscript a large number of steps are required to process a typical survey:

1. Prior to the due date of the form, reminder letters are sent to the respondents requesting that the form be returned on time.

2. Following the due date, delinquents are asked to report as soon as possible, the first and second requests being by mail, the third request by telegram and a final request being made by personal telephone contact. The ultimate goal is 100% response.

3. A form, on being received, is logged in, scanned for egregious errors; the data are placed on punch cards and then on tape. The tape is edited by means of a computer program which checks for such things as addition errors, presence or absence of data in key cells, consistency between parts of the form and level of reporting with respect to previous years.

4. Errors, including key punch errors, discovered during the scanning and machine edit process are examined by clerical, supervisory and, in difficult cases, by subject matter specialists. Many errors must ultimately be resolved by contacting the respondent by mail or telephone. Since some publications give institutional listings of reported data, an attempt is made to make the data as error-free as possible. Corrections to the reports are recycled through the edit program until such time as there are no errors detected in any reports. It is not uncommon to have as many as a dozen machine edit cycles.

5. Although the ultimate aim is 100% response, this goal is not possible to attain in all surveys despite repeated follow-up attempts. Those survey units not responding (usually less than 5% and often only 1 or 2 percent) are imputed in order to attain universe totals. With the addition of imputations, the data tape is declared clean of errors detectable by the edit process. If the survey is a sample survey, it is necessary to compute sampling weights and weight the data.

6. Using the clean data tape, tabulations are made using computer programs previously specified. The tabulations are examined for reasonableness and consistency. At this point it is sometimes determined that, although the detail has passed edit checks, the aggregates indicate that errors have been allowed to occur and it is necessary to make corrections to the data tape. When all tabulations have passed the reasonableness and consistency checks, final camera copy tables are run.

7. At the time the tabulations are being made, the manuscript is prepared and entered into a review process during which the professional members of NCES review and comment on the content. The manuscript is also reviewed for conformance with editorial specifications by professional style editors within NCES. Ultimately the comments of reviewers within NCES are incorporated and the revised manuscript in final form is reviewed by the Office of Education editorial staff. Such changes as they may request are made and the completed manuscript is sent to GPO.

10c–3. *Is the length of turnaround time that is required from the initiation of a survey to publication of results the result of manpower shortages in NCES or what?*

A major part of the problem is the manpower shortage in NCES. It is estimated that to make all of our survey data available in published form on a timely basis the Center would require 85 additional personnel. With this level of staffing, recurring basic statistics would be available in six months to a year instead of the current 8 months to 44 months. A major proportion of the additional personnel would be assigned to doing technical editing of the responses and to provide technical assistance to the respondents to improve both the size of response and its timeliness.

Other causes for delay exist.

The lack of technical expertise within the Office in computer-programming for statistical applications has caused specific severe delays in recurring survey reports due to errors requiring extensive re-runs. There may well be additional losses of time and costs because less-efficient-than-possible programs have been used. Such losses are not measurable since they are usually not detected. Such costs could be prevented by expert in-house monitoring.

Another source of delay is the necessity for suppression of data to meet institutional requests for privacy of individual institution figures on selected financial items. This is a technical task whch is tedious, which can be speeded greatly by competent specialists who combine several skills and knowledges in computer science, statistics, and educational finance. In this area, we have undertaken to reduce the problem by strongly encouraging institutions to remove restrictions on their data. That has been rather successful, but a residual problem continues.

Many States and institutions regularly fail to meet stated reporting dates. One illustration is *Statistics of State School Systems*, received as much as a full year late from at least one State. We believe these failures result from particular problems associated with the flow of information within the State, or with incompatabilities between recording and reporting practices at the State level and the reporting categories requested. We are confident that technical assistance staff who could work in the field with the States on short turns would be extremely productive in improving timeliness, and quality as well. Indeed, we feel State data would benefit as much as the NCES data.

Being unable to staff for the Center's full mission, we have contracted for a number of new activities. This can be particularly effective for projects which intrinsically permit total-systems contracting, where interim monitoring and interactive participation by in-house staff may safely be limited to modest proportions.

Contracting, in turn, involves delays. The necessity for careful advertising, description of the full project design for an RFP, allowance of time for proposals, review of proposals, selection of a preferred proposal, and negotiation of the contract, all take a great deal of time before the project begins. Monitoring and reporting between NCES and its contractors are a continuing time-and-effort requirement. Moreover, contracting necessarily involves time for orientation of a staff new to NCES needs, and time for the formal record-keeping needed to establish performance in conformance to contract obligations.

Beyond the time lag encountered in a particular contract, controls on contracting activity impose a cycle which make it impossible to move forward with a contract at desired time if the project need emerges, for example, after some time in April. If, as frequently occurs in recent years, the Education appropriation is delayed and OE operates under a continuing resolution for some time, that may offer a barrier to executing any major contract.

In brief, NCES is vigorously attacking the timeliness issue in a number of ways. An answer which provides more than temporary patch-work will involve significantly greater numbers of highly qualified staff, together with contractual assistance for important types of activity.

10d. *What procedures do you have for checking the data which you receive with the records of those sampled or with existing NCES information?*

The procedures for checking the data for errors with existing information are those discussed above in answer to question 10c. The data is checked as appropriate against selected information available to NCES. A typical set of such existing information used for this purpose for the HEGIS, one of the largest NCES surveys is as follows:

1. The college catalogues for an institution of higher education.
2. The published financial reports of the institution.
3. Similar data for the same institution for previous years.
4. Similar data provided by the same institution to other surveyors.
5. Similar data provided by similar institutions in the same or other surveys.
6. Other data for the institution which ought to be in fixed range or proportion; e.g. student-teacher ratios, expenditures per student, square feet of space per student, earned degrees per student enrolled, fields of degrees versus accreditations, etc.
7. Data on record in other Federal agencies and in semi-public agencies; e.g., NSF, NIH, NAS, etc.

In order to measure the quality of the data reported, reliability and validity studies were started with HEGIS V Finance and Employees surveys and with the ELSEGIS V surveys. These will continue on a rotating basis to check each survey in the HEGIS and ELSEGIS packages about every three years. In this process a sample of responding institutions (institutions of higher education in the case of HEGIS and a sample of State education offices in the case of ELSEGIS) is selected and interviewers visit them with a copy of their report to determine the sources of data reported and attempt to measure their accuracy. From this sample, estimated net and gross errors are produced and the results studied in order to judge the efficacy of the form, to determine the presence of possible bias, and to make improvements in subsequent surveys.

10e. *What would you consider to be the major annual or semiannual survey undertaken by NCES? What is the size of the sample? Are the same respondents included in repeated samples in order to get longtiudinal data?*

The LEA finance survey is considered to be the major annual survey of NCES. For the reasons given in response to question 13d in a large sample of 5,100 was used for ELSEGIS III, 1969-70. For ESLEGIS IV, 1970–71 and ELSEGIS V, 1971–72 the sample was reduced to 2,500. Because of our manpower crunch the sample was reduced to 934 districts in ELSEGIS VI, 1972–73. In each of these years all systems of 25,000 enrollment or more were included (183 systems in ELSEGIS VI); in ELSEGIS III thru V all systems with 10,000 enrollment or more were canvassed (742 systems in ELSEGIS V), and in ELSEGIS III all systems with 5,000 enrollment or more were covered (1,850 systems). A sample of all smaller LEA's was drawn each year. Because of the dynamics of school district reorganization it is difficult to set up a continuing panel on a sample basis. Therefore, for those districts which were sampled rather than taken at certainty, a separate sample was taken every year. For the comparable systems a longitudinal study (trend analysis) is planned for fiscal year 1975.

10f1. *What progress has been made and what problems have occurred in coordinating the collection of data for all branches of the Education Division?*

The response to this question insofar as it relates to the Office of Education is given above in response to question 10a4. Insofar as it relates to NIE coordination is effected by: (1) an NIE and NCES agreement whereby NIE collects statistical data only with regard to its own research projects and does not collect national statistical data; (2) by coordinating the data which NIE does collect through NIE's membership in the Subcommittee on Changes of the Office of Education's Data Acquisition Task Force; (3) by involvement of NIE staff members in the annual planning cycle for NCES surveys and in submitting data items for inclusion in specific surveys to meet NIE information needs for research purposes.

10f2. *Why are several branches still collecting their own data on such basic items as the number of children needing special programs?*

The several Offices in OE responsible for specific educational programs require data for program administration. Data such as number of children needing special programs is used for the following purposes: Determine counts of eligibles; Assess the distribution of funds, services, and participants; Serve as a basis for legislative reform proposals; and Use in OMB and congressional justifications and hearings.

The responsible program officers initiated program reports and other procedures to collect such data, through the SEAs.

The planned statistical reorganization discussed below in question 10f3, made provision for the Center (at its option) to provide technical monitorship of collection and processing, or to collect and process, these program administration data. Staff and other resources for carrying out this aspect of statistical reorganization have not yet been made available to NCES.

10f3. *Have there been any attempts to place the responsibility for all data collected in NCES?*

Commissioner Marland's memorandum of October 12, 1972, to the Assistant Secretary for Administration which discusses Statistical Reorganization, described certain actions to centralize data collection within OE. Transfers of selected data collection activities to NCES were directed. "For the future," the memo stipulated, "data collection activities which are longitudinal or which are expected to involve 3,000 or more respondents or to cost $400,000 or more will be managed directly by NCES or in the case of integrated evaluation projects monitored by OPPE (Office of Program Planning and Evaluation), will be co-monitored by NCES." The Center was also assigned "technical statistical review responsibility for data collection activities in other projects funded at a level of $100,000 or more involving 1,000 or more respondents. Data collection aspects of research projects are excepted from the $400,000 or 3,000 respondent criterion for direct NCES management when the objective of the funded project is development of curriculum or other educational procedures for handicapped children."

The memorandum also reiterated that "the ACES is responsible for effecting close external linkages on the areas of data requirements, statistical standards and statistical policy."

Because of S&E limitations the personnel to implement this statistical reorganization have not yet been assigned to NCES.

10g. *What survey findings and data are available in an automated form and easily accessible by program managers and decision makers throughout the Office of Education and NIE?*

Program managers and decision makers now have available to them the NCES EDSTAT system, as described in our response to Question 1. EDSTAT is an online, user interactive (through the use of a computer terminal) large scale information retrieval and statistical reporting system. It maintains a library of approximately 100 million characters of educational data which can be retrieved or processed through user supplied models in an "immediate" time frame. Though a conceptual design for such a system was being performed by NCES, the first tapes for EDSTAT were acquired from the National Commission for the Financing of Postsecondary Education (NCFPE) in mid January, 1974.

Since its acquisition, NCES has expanded the online data base and extensively evaluated its capabilities, with particular emphasis on EDSTAT's ability to provide meaningful information to educational decision or policymakers, and to minimize user costs.

Our response to Question 1-d includes a list of data bases now available on EDSTAT, as well as those which will be entered in the system by August 1974. However, it should be noted that data from many other surveys are available on computer tapes, although they cannot presently be accessed through EDSTAT. Our response to Question 1-e provides a list of all computer tapes which have been released by NCES.

In addition, there are survey-type data collected as part of program management, which are included in program management automated systems and available to program managers. As an example is the automated property file for the School Assistance in Federally Affected Areas Program.

10h. *It seems to us that much of the work of NCES during the past few years has been concentrated in the area of data collections with little attention given to analysis of the data which has been obtained. How can the analytical capabilities of NCES be strengthened in order to make the data more useful and usable?*

The analytical capabilities of NCES can be strengthened by the application of additional professional staff resources and some moderate amount of additional financial resources. The primary need is for a core staff of professional analysts with a variety of backgrounds including specialists in educational finance, demography, and educational psychology, and some analysts who have specialized in quantitative policy studies.

Such a staff would be invaluable in applying existing data to policy issues, in highlighting the need for important additional data and in providing a powerful stimulus to improving the basic data reports.

The Center has always recognized the need for a sustained analytic effort. Ever since 1968, when the Office of Education eliminated the existing NCES analysis capability because of a need elsewhere in the Office for the staff resources allocated to the function, attempts have been made to reinstate the capability. Each year since 1968, NCES has been requesting ceiling points for this purpose, without success.

10i. *Why was the literacy survey recently reported in the Washington Post conducted by the National Center for Health Statistics and not by NCES?*

The NCHS literacy survey was conducted between 1967 and 1970 as part of the Health Examination Survey and has now been reported 4 years later. Only in the past few years has the funding necessary to establish continuing survey vehicles become available for the Center to report on reading or literacy data. The first such vehicle is the National Assessment of Educational Progress (NAEP). In this survey reading was tested in the Fall of 1970 through the Spring of 1971 and ten reports on the reading levels of the populations covered were published. With active NCES involvement, NAEP is now conducting a "mini-assessment" of the functional literacy of 17-year-olds enrolled in school for USOE's Right to Read Office. This is an exploratory study to test the feasibility of measuring the functional ability of 17-year-olds to perform basic skills considered requisite to survival in the society. The concept is based upon earlier work by Louis Harris and Associates and NCES for the former National Reading Council. The plan is to report results on functional literacy in reading among 17-year-olds enrolled in school in Fiscal Year 1975.

A second survey vehicle is the NCES National Longitudinal Survey of the High School Class of 1972. This survey consists of a sample of 20,000 high school seniors who were originally surveyed in the Spring of 1972 and resurveyed in the Fall of 1973. The original survey included a battery of standardized tests including reading. Follow-up data have been collected from over 95 percent of the designated sample of 20,000 high school seniors. Within the calendar year 1974, tapes are expected to be available which will indicate by achievement levels of high school seniors, how many went on to obtain postsecondary education, how many went to work, etc. As these people are planned to be resurveyed in the Fall of 1974 and other future times it will be possible to relate high school reading performance to future employment outcomes and other early adult behavior.

11. *Relationship between data collection and policy making.*

11a. *What are the long-range goals of NCES and who decides these goals?*

The long-range goals of NCES were succinctly defined in 1867 in the Organic Act establishing the Federal Education agency which set forth several objectives for that agency, chief among them that of "collecting such statistics and facts as shall show the condition and progress of education in the several States and territories and diffusing such information respecting the organization and management of schools and school systems and methods of teaching as shall aid the people of the United States in the establishment and maintenance of efficient school systems and otherwise promote the cause of education throughout the country."

This goal was detailed more specifically in a statement of objectives for OE's statistical program by the Advisory Panel on Educational Statistics which reported to the then Commissioner of Education Francis Keppel in December 1963. These objectives follow:

1. To anticipate the educational statistics needed as a factual basis for the establishment of relationships, for identification of problems, for the formulation of policies, and for the planning, developing, and administering of operating programs by: a. Congress and State legislatures, b. Office of Education and other Federal agencies, State departments of education, c. educational institutions and associations, and d. educators; local, State, and Federal officials; industry; and other economic and social workers.
2. To provide adequate, timely, accurate, and useful basic educational statistics at all levels.
3. To collect facts which supply a continuous and systematic record of status, progress, trends, predictions, and projections.
4. To maintain a center to assess, integrate, disseminate, and exchange educational statistics and information.
5. To acquaint users with the availability, accuracy, and basic meaning of the statistical material.
6. To work with the State educational agencies, other government agencies, institutions of higher learning, and the general public in the establishment and maintenance of efficient school systems at all levels.
7. To provide data that can be used as measures for evaluating the utilization and productivity of education.
8. To advance knowledge by developing better methods for securing educational statistics and information.
9. To review and modify objectives continuously as changing conditions require.

These objectives were adopted by the Assistant Commissioner of Educational Statistics as the goals of NCES in 1968. They have been presented to various

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Deputy Commissioners in presentations and implicitly approved. They have also been used in developing budget requests and implicitly approved by the Department in the approval of the budget request. A more explicit approval of the Center's objectives is found in the mission statement of the Center which as of October 1971 was approved by the Commissioner of Education: Designs, directs, coordinates and executes all statistical programs of the Office of Education. Provides leadership in educational statistics at the Federal, national, and international level. Develops an integrated and interlocking system of educational statistics to meet Federal, State, local and institutional needs for planning and management. Gathers, stores, analyzes, and disseminates statistical data and analytical tudies to show the condition and progress of American education. Relates educational statistics to critical public issues and provides quantitative information for decision and policy makers at all levels of society. Establishes and implements technical statistical standards for Office of Education data collections and reporting. Maintains liaison and provides statistical support to all Bureau and staff offices on data acquisition needs and reporting requirements.

Despite the primacy of its function, since its inception in 1965, the National Center for Educational Statistics has had to divide its severely limited resources among efforts to develop and collect policy and program related data for the Congress and the Office of Education, and at the same time continue the basic time-series data collections wanted by the States, institutions of education, businesses, and other consumers of data.

The long-range objectives of the Center unquestionably include the collection of data essential for the development of national policies by the Congress. Data on handicapped children, for example, have been needed urgently to assist in the formulation of national policy in that field. S.1539 itself calls for a survey of all 5 to 17-year-olds in the population, the information from which would serve as the basis for the development of a variety of legislative policies. Although these surveys can be conducted on a sample basis, to be properly done they must be conducted on a house-by-house basis. Requirements of these types demand enormous quantities of both money and manpower. The school-age population survey asked for by S.1539 by itself would cost an estimated $28 million.

In point of fact the size of the budget and the manpower available are the chief determinants of the operational goals of NCES. For fiscal year 1973 NCES submitted a budget which would have encompassed adequately, through the Common Core of Data concept, both Congressional and OE data requirements. The actual budget for NCES during FY 73 in fact was only $10.25 million of which $6. million was for the National Assessment of Educational Progress.

The Coleman Report was one of the most useful social science surveys, and certainly the largest, ever undertaken in this country. Manpower to perform this task, however, had to be drawn away from the more traditional but much-in-demand time series surveys. The setback to the timeliness of those series is still being felt, years later, because so much manpower was diverted.

Similarly, the longitudinal study of high school graduating classes now underway is a significant and needed "first", but it comes at high cost to the NCES budget. If the longitudinal effort is to go forward, other work will have to wait.

Decisions by the Commissioner to increase NCES' manpower have been more than offset by additional functions transferred to the Center in recent years.

In sum, NCES' goals, set by the interplay of cooperative planning and decision-making, in the final analysis are year after year trimmed to interim operationally feasible targets established by the limits of money and manpower.

11b1. *How does the Commissioner view the role of NCES?*

It is obvious that the policy needs of OE are the first concern of NCES. If NCES fails to produce data for the policy guidance of OE, its other activities cannot salvage the loss to OE managers. In practice this has not meant that NCES has had to abandon other objectives, but that certain OE requirements have had to have first claim on NCES resources.

11b2. *What is its relationship with the rest of the Office of Education? What should it be?*

The process of establishing and meeting OE's policy data requirements has been a comeplex affair involving some distribution of responsibility. NCES continues to coordinate the planning of general, repetitive, surveys, while the program bureaus maintain responsibility for collecting their own program data. We anticipate that the Common Core of Data concept will result eventually in an effective amalgam of data collection activities, both policy- and program-oriented. This integration of survey planning and data collection to meet both policy and program requirements obviously is the direction in which NCES and OE should be, and are, heading.

11b3. *What do you view as its role in the educational community?*

Whatever the nature and priority of its obligation to OE, NCES continues to believe that it has an obligation to serve the educational community at large, and that the Center has a great deal more to do to serve that community adequately.

11c. *Have there been any internal cross-divisional studies of the role of NCES, its objectives and activities? If there has been no study, do you have plans for one? When will the findings and recommendations be available?*

There have been a number of internal (cross-divisional) studies of the role of NCES. In October 1970 NCES prepared a lengthy issue paper on the role of NCES, its objectives, and activities. In October 1972 the Commissioner of Education, in a memorandum to the then Assistant Secretary for Administration and Management, reported extensively on OE's statistical activities. In early 1973, Commissioner Ottina conducted a review of NCES functions, priorities, and resources. This review by the Commissioner was undertaken in response to the NCES' Director's request for assistance in meeting a crisis caused by the radical curtailment of overtime and temporaries, together with the imposition of further reductions in the NCES personnel ceiling. The review involved the participation of all OE deputies, and each was encouraged to list his specific requirements for NCES data and products.

As a result of the review the Commissioner added 17 positions to the NCES staff, and at the same time a significant number of uncompleted projects were dropped.

Out of these studies has come clearer perception of NCES functions and priorities. Nonetheless, despite efforts to increase its resources, NCES has found it increasingly difficult to maintain its basic time series statistics and at the same time meet a constantly expanding arc of requirements imposed by greater national interest, investment, and expectations in the education sector.

11d. *What is the relationship between the data collection functions of NCES and the plannning, evaluation and decision-making functions of the rest of USOE and the Office of the Assistant Secretary for Education? What could be done to integrate the needs identification and data collection, planning, decision-making, and evaluation functions more effectively for better management of the Federal Government's part in the education enterprise?*

There is a natural and almost inevitable web of relationships involving planning, evaluation, statistics, and decision-making. Recognizing this, OE has recently been reorganized to bring together in a single deputyship the planning, evaluation, budgeting, legislative, and statistical functions to facilitate the decision-making processes with in the Office of Education. With experience, the juxtaposition of these functions will result in increasingly better focused and more effective decision-making.

The Office of the Assistant Secretary for Education has and will continue to utilize the resources and products of NCES. Specifically, for example, the policy development group in ASE, now deeply engaged in substantive areas of education, is examining policy options in student aid with the aid of NCES HEGIS data, and NCES' ELSEGIS data are being used in a study of school finance issues.

With respect to the better integration of planning, evaluation, and other functions with statistics, NCES has for several years sought to improve the Federal performance, and perception of key objectives, by conducting a series of planning conferences to obtain input from the entire Education Division, as well as non-Federal consumers of data. Other offices within OE, NIE, ASE and ASPE have been asked to assist in the identification of needed data, and to help in the integration of information in the most broadly useful fashion possible. This led, for example, to the addition of questions on student aid to the Longitudinal Study of High School Seniors for use in policy analyses on student aid.

11-e-1. *What role does NCES serve in the executive branch's legislative and budgetary process?*

The National Center's general statistics and projections, published in *Digest of Educational Statistics, Projections of Educational Statistics, Statistics of Trends in Education*, and the other more detailed reports, provide basic data on magnitudes of educational requirements. These are underlying data necessary to informed judgments on legislative, programming, and budget-making decisions.

In the legislative process, the OE Office of Legislation, on its own behalf and at the request of the Department and Congressional Committees, calls on NCES for numerous estimates of the distribution of funds under alternative possible formulas and provisions being considered in educational assistance programs. These are typically requests under very short deadlines.

The National Center for Educational Statistics also provides to the Office of Education's Budget Office allocation tables (estimated and final) as requested on all education formula grant programs except Indian Education and Impact Aid. To provide these tables, data are compiled from many sources including: NCES, the Bureau of the Census, Division of Compensatory Education (OE), Bureau of Education of the Handicapped (OE) and the National Center for Social Statistics of the Social and Rehabilitation Service.

In addition to such recurring participation in the legislative and budgetary processes, the Center has made at least two contributions to building the capacity for analysis in support of these functions. The Center planned and carried out a major project to cross-reference school district areas and Census enumeration districts, in order to tabulate socio-economic data collected in the 1970 census of population and housing in terms of school districts. These tapes have been provided to the Congressional Research Service, have been used by Assistant Secretary for Planning and Evaluation, the Commissioner's Task Force on School Finance, Office for Legislation, Office for Planning, Budget, and Evaluation, and NCES, and are available to the public. In addition to the above types of census data, NCES provided the Congressional Research Service extensive ELSEGIS survey data on tape, making up a powerful reference and analysis library in computer-readable form.

11e2. *Is anyone looking ahead to determine what kinds of data might be required in areas of legislative and budgetary interest in future years so that the necessary data will be available when needed and we can avoid some of the problems we have faced this year in regard to preposed changes in Title I and Impact Aid because of the lack of data from which to make accurate projections?*

Intrinsically, policy-makers and their analysis aides should anticipate future data needs for policy purposes. Unfortunately, many policy staff people are so oriented to the short term that they fail to identity their needs in advance. Within the Department, the Assistant Secretary for Planning and Evaluation initiates policy questions as the basis for Issue Papers in connection with each year's program planning. The Assistant Secretary for Education, the Commissioner of Education, and the Director of NIE have policy analysis staffs, which are concerned with preparation of Issue Papers and with forward program planning and design.

The National Center for Educational Statistics has involved these executive branch staffs, and Congressional Committee staffs, in NCES program planning. Such involvement implicitly invites advice as to needs for policy decisions three or four years in the future, when the surveys will have been developed, tested, conducted, data processed, analyzed and disseminated. The Center plans in its next program planning cycle to make even more explicit the request on policy-makers and analysts to anticipate their needs several years ahead. NCES staff will to the extent possible help them by suggesting possibilities which seem likely candidates.

NCES efforts in developing the CCD data program are expected to contribute materially to the advance identification of data needs. In designing the proposed CCD Data Base for Elementary-Secondary Education, three types of issues were examined:

(1) Issues that are essential to the planning or management of one or more Federal educational programs,

(2) Issues of current and immediate importance to the national educational community, and

(3) Issues or questions which are expected to emerge as educational problems of national significance.

Thus, the framework upon which the proposed data base has been built attempts to include a thorough look into the future. Although it is impossible to predict completely and accurately all issues which may arise in the next 5–10 years, it is anticipated that the data base approach chosen will permit greatly increased flexibility for analysis of information in ways which will address issues not anticipated at the time of data collection. Developments in the postsecondary area will similarly attempt to identify data requirements which may arise in future years. In these efforts we would emphasize the responsibility of policy makers to involve NCES in their problems and deliberations.

11-f-1. *What is the relationship between NCES and NIE?* .

The National Institute of Education is required by law to:

". . . conduct educational research; collect and disseminate findings of educational research; train individuals in educational research; . . . . promote the coordination of such research . . . within the Federal Government . . ."

NIE and NCES coordinate efforts in a number of ways:

(a) NIE utilization of NCES statistical data A description of the kinds of information which NCES provides is supplied in response to Question 11.f.2.

(b) Coordination with OE data acquisition efforts. NIE and NCES coordinate education data collection efforts through NIE's participation on a subcommittee of the Commissioner's Task Force for Planning the Acquisition of Information. Through this mechanism, NIE and NCES can have complete and current information regarding data collections planned by the two agencies.

(c) Exchange of professional expertise. NIE staff members have procided professional expertise by participating on RFP panels (e.g., DSPA's HEGIS systems contract and DSIS's Design Study for Preparation of Educational Personnel) and on the Advisory Group for the Longitudinal Study of Educational Effects.

NIE representatives serve on the Education Personnel Statistics Committee of NCES and have participated in the planning and review of reports in the fields of supply and demand of education personnel and on the status of the education professions during the past year. NIE has been represented by two members of this 20-member committee which also includes OE-wide representation.

(d) Planning new services. NCES has involved NIE extensively in developing plans for the Educational Statistics Information Access System, (EDSTAT). NIE planned to provide $500,000 of FY 74 funds for the program which did not materialize when the NIE appropriations request was severely reduced by the Congress.

(e) Coordination of data dissemination efforts. NCES has recently expanded its communication with NIE to seek effective use of NIE vehicles in dissemination of information on the CCD program. NCES personnel have briefed NIE staff responsible for information dissemination on the plans and operation of EDSTAT as well as other components of CCD. Further, NCES personnel will assist in NIE's selection of the contractor who will be redesigning the ERIC Dissemination System. We will continue to coordinate with NIE to use existing resources and to ensure compatibility of future developmental work.

11.f.2. *What kinds of information has NCES provided to NIE this year?*

NIE utilizes NCES statistical data as provided by printed reports, staff interactions, and computer tapes. For example, NIE now has and has utilized 20 NCES tapes with information collected from the Elementary and Secondary General Information Survey.

From time to time, NIE staff members call our Reference, Estimates, and Projections Branch for information or publications; such calls average about 1 or 2 per month. Specifically since January 1, 1974, REP has a record of six inquiries from NIE; examples of recent requests for data include trends in school expenditures, by source; trends in school dropout rates; numbers of classroom teachers, principals and supervisors in 1972; total enrollment, expenditures and schools, 1973–74; number of elementary schools and number of 1-teacher schools, 1971.

NCES recently incorporated specific questions in instruments for the pretest of the Statistical Survey of Elementary Schools at the request of NIE staff. Information on student mobility, teachers' years at the school for staffing pattern analysis, teachers' perceptions of student performance and achievement, and other topics were requested in support of specific educational research interests of NIE.

11.f.3. *Has NIE undertaken any of its own data collections? Why?*

The Director of NIE has stated; ". . NIE collects statistical data only with regard to its own research projects. NIE does not collect national statistical data."

However, in a related activity, NIE has recently let a contract on the subject of educational research and development. Under this contract, existing data bases rather than new data collections will be utilized to produce a Fact Book on Educational R&D, including such topics as money, people, products and institutions. Another facet of this contract is a determination of the ways in which different data collection agencies collect and store data; information on this point should aid NIE and other researchers (including OE) in using existing data. Another longer-range purpose of this effort is to aid in building a model of the educational R&D system.

11-g. *Among the major issues now confronting all of us are the effects of the energy crisis on our schools, the provision of equal educational opportunity for all students regardless of handicap whether it be special bilingual programs for non-English or limited-English speakers or programs for special education students, and State school finance reform. In order for us to determine what the Federal role should be in each of these areas, we are going to have to have timely and reliable information on which to base our decisions. How can NCES be more responsive to the Congress' needs on issues such as these?*

A critical determinant of NCES ability to be responsive to Congressional needs is the extent and level of NCES professional interaction with Congressional Staff, Congressional Research Service staff, and policy analysts in the education community, as well as with our own DHEW policy analysis and program officials. We would underscore the responsibility of these groups to help NCES by identifying in advance the prospective needs for issue-related data, and to involve NCES in issue-definition and priority setting deliberations. However, NCES does not wait passively for policymakers to take the initiative in sharing their concerns. For example, in planning the annual HEGIS surveys, NCES has regularly held conferences on user requirements, involving the higher education community and Congressional staff. In addition, FICE, which represents 22 Federal agencies, and all sectors of the Education Division have been consulted. Similarly, the development of the Longitudinal Study has, from the start, been guided by formal planning conferences and formal and informal consultations involving educational researchers and data-users outside OE and throughout OE. More recently, Task Forces representative of data users in all Deputyships of OE have been established to guide NCES in the development of the elementary-secondary and the postsecondary CCD.

Limitations on staff constitute a major obstacle to devoting the requisite amount of time and effort to issue identification, liaison with users, and participation in substantive analysis, in order to guide our planning for the acquisition of data of new types for which needs are likely to emerge.

The several surveys which would be mandated by different provisions of S 1539 and HR 69 give indications of some of the concerns of the Congress for data, though there is no clarification of relative priorities among them. The further things needed for NCES to be responsive are: adequate staff resources to plan, design, and manage the major survey activities; continuing consultation by responsible staff representatives of the Congressional interest to help define priorities, precision requirements, timing of needs, tradeoffs among precision, detail, timeliness, and other output characteristics; appreciation by the Congress that new major projects require significant development time and that changes in user expectations may be, in effect, a brand new survey request with a new starting time for development; reasonable continuity in budgetary support and availability of qualified high level professional staff.

11.h. *During recent years, there has been much criticism of NCES by the Congress of the inordinate number of surveys which are conducted and the paperwork burden placed on respondents, of the duplication of requests for the same or very similar pieces of information, of the length of time it takes to put the data in an understandable and usable form, of the lack of responsiveness by NCES to Congress, and the lack of timely and accurate information for making decisions. Could you please tell us what changes have been made in the structure, management and functions of NCES as a result?*

The establishment of the Task Force for Planning Acquisition of Information, and the development of the Annual Data Plan are directed to reducing

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paperwork burden. The purpose of the TFPAI and the associated forms review process with the States is to eliminate the problems that brought forth criticism of duplication. The Task Force is office-wide because the problems are across the office rather than within NCES. Included in this effort is the automated forms file and table index (soon to be put into use in OE). In this area, progress is limited by resource constraints, especially financial and staff support to the Task Force.

Two large data collection programs, the Federal-State Task Force (CPIR, ESS and SSS) and the educational manpower statistics program have been transferred to NCES to facilitate coordination and consolidation of surveys.

The Common Core of Data program, a major new threat, has been launched, and if adequately supported, is expected to provide the substantial change which the criticisms concerning paperwork burden call for. CCD, when implemented with genuine Congressional support which can provide confidence in continuity of resources, would involve realignment of the organization and addition of the program data collections to the functions of NCES.

The changes described in Question 1, with respect to increased timeliness of NCES output, should also be noted.

Project priorities are now determined by a multi-stage process of program review, involving other sectors of OE, of HEW, other Federal agencies through FICE, and Congressional staff representatives as well. More frequent professional interaction with Congressional Staff will help NCES be more responsive to Congress. This procedure, in conjunction with efforts to limit our program to a scope which is realistic in relation to our staff, should tend to make our output maximally useful within the imposed limitations.

Finally, it should be recognized that NCES is a product-oriented unit which has consistently not received adequate support to meet the expectations for educational statistics; thus changes in "structure, management, and functions" have not (and probably would not) achieve the dramatic changes desired until more substantial resources are forthcoming.

12. *Office of Civil Rights (parts a–e inclusive)*

This question is largely concerned with Office of Civil Rights, and I have requested the Director, Office of Civil Rights, to reply directly to the Committee.

One sub-question, d, concerning relationships between our organizations, is appropriate for OE response, in addition to that by OCR.

12d. *To what extent, if any, does the Office of Civil Rights work with the National Center for Educational Statistics and/or other bureaus within the Office of Education in its data collection effort? Please describe.*

The National Center for Educational Statistics has maintained a close working relationship with the Office of Civil Rights in its survey activity. The NCES universes (complete lists) of both elementary/secondary schools and higher education institutions are used by OCR for survey control operations. In addition, OCR uses the NCES school universe for sample selection. OCR has adopted the NCES institutional identification numbering systems with the result that OCR institutional data from its surveys can be integrated with other data collected by NCES from the same respondent group.

NCES personnel have assisted OCR in the development of its surveys, including technical reviews and criticisms of OCR survey instrumentation. Wherever possible standard OE terminology and definitions have been provided by NCES and used by OCR on the OCR questionnaires.

Currently, NCES, OCR, and the Equal Employment Opportunities Commission (EEOC) have combined their staff personnel reports from local school systems into a single survey called the EEO-5, administered by a joint reporting committee sponsored by EEOC and staffed by the three agencies. This survey collects staff employment data from elementary/secondary school systems needed by EEOC to carry out its responsibilities under Title VII, Civil Rights Act of 1964 and also provides data to OCR and NCES.

EEOC is developing a survey of employment by institutions of higher education, with the cooperation of OCR and NCES, to be designated EEO-6. This may reduce, but not eliminate, NCES data collection in that field.

12-1. Office of Civil Rights

a. What education surveys are conducted by the Office for Civil Rights in the Department of Health, Education and Welfare? Please describe each in detail, including information on the type of data collected, the scope of the survey (sample size, and the cost of the survey, the manner in which it is conducted (whether it is contracted out or done within the Office for Civil Rights), the types of analyses performed on the survey data, and the particular division within the Office for Civil Rights responsible for the analysis of the survey data.

b. What education surveys does the Office for Civil Rights plan to conduct during this coming fiscal year? If surveys not included in the response to question a. above are planned, please include a detailed description of each.

c. What additional education surveys or analyses, if any, has the Office for Civil Rights wanted to conduct with the last two years but not been able to conduct because sufficient funds were not available? Please describe.

d. To what extent, if any, does the Office for Civil Rights work with the National Center for Educational Statistics and/or other bureaus within the Office of Education in its data collection effort? Please describe.

e. How much money has been requested and allocated for the Office of Civil Rights for fiscal years 1970–1974? Please include a subject matter breakdown of expenditures within the Office for Civil Rights during these fiscal years and indicated under each subject category a breakdown of funds expended for data collection and the analysis of data.

OFFICE FOR CIVIL RIGHTS

12(a) *Elementary and Secondary School Rights Survey.*

Scope

This is an annual survey which has been conducted since fall, 1966. The survey is conducted pursuant to the nondiscrimination provisions of Title VI of the Civil Rights Act of 1964 and Title IX of the Education Amendments of 1972.

Surveys conducted in fall of 1968, 1970 and 1972 were designed to be representative of all public school districts with 300 or more students and the surveys include approximately 8500 school districts. However, surveys conducted in the odd numbered years were designed primarily for compliance purposes and include approximately 3000 school districts. Included in the latter surveys are school districts desegregating pursuant to court order or voluntary plans approved by the Department, districts in litigation, districts with minority enrollments of ten percent or more, and districts containing one or more schools with minority enrollments in excess of fifty percent. Coverage provided under the sampling design for the past three surveys is indicated below:

ELEMENTARY AND SECONDARY SCHOOL CIVIL RIGHTS SURVEY (1972-73)

[In thousands]

Survey, Fall	Districts	Schools	Total students	Minority students
Number surveyed:				
1971	3	37	23,714	8,887
1972	8	73	41,436	9,476
1973 estimate	3	39	23,572	8,981
Number represented:				
1971	3	37	23,714	8,887
1972	12	82	44,475	9,657
1973 estimate	3	39	23,572	8,981

Data

The fall 1973 survey forms are attached at Tab A. Form OS/CR 101 is completed by school districts. Form OS/CR 102 is completed by individual schools.

Costs

The table below indicates estimated costs for the Elementary and Secondary School Civil Rights Survey:

SURVEY COSTS (ESTIMATED)

Survey year	Contract cost	Forms and directory	OCR staff	Total estimated cost
1971	$343,443	$10,000	$100,000	$453,443
1972	547,015	41,135	100,000	720,593
1973	257,281	10,240	50,000	317,521

Conduct

The Elementary and Secondary School Civil Rights Survey is conducted pursuant to a contractual arrangement and is directed by the Elementary and Secondary Education Division and the Office of the Assistant Director (Administration and Management.) The analysis of data is the responsibility of the Elementary and Secondary Education Division, which utilitizes computer printouts as provided by the contractor.

Analysis

Analysis formats for the 1973 and 1974 surveys are being designed. The 1972 Enforcement Analysis Tables included a series of statistical tables listing school districts' ranking according to compliance issues.

BIENNIAL COMPLIANCE REPORT OF INSTITUTIONS OF HIGHER EDUCATION UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Scope

The Biennial Higher Education survey has been conducted since 1968. The survey will be conducted again in fall 1974. The survey covers almost all institutions of higher education—approximately 2,700 colleges and universities, 6,000,000 full-time students, and 700,000 full-time minority students.

Costs and Conduct of Survey

The survey is designed and administered by the Office for Civil Rights' Higher Education Division. The analysis and printing of findings is performed under contract with a private firm. The cost of the survey is approximately $200,000, including OCR and contractor services.

Analysis

Analysis of 1972 survey data consisted of determining compliance rankings for each institutional component (defined as a school or division within an institution). The analysis was conducted by a subcontractor.

CIVIL RIGHTS SURVEY OF AREA VOCATIONAL-TECHNICAL SCHOOLS

The survey was conducted for the first time in winter, 1974, pursuant to the nondiscrimination provisions of Title VI of the Civil Rights Act of 1964 and Tiitle IX of the Education Amendments of 1972. The survey included approximately 1,500 institutions designated by the Office of Education as Area Vocational-Technical Schools. These include certain secondary schools, post-secondary schools, and community colleges.

The survey was designed and administered by the Elementary and Secondary Education Division. Survey forms are being evaluated by individual regional offices. The cost of the survey is approximately $2,300.

CIVIL RIGHTS SURVEY OF SPECIAL-PURPOSE SCHOOLS

The survey included all special-purpose schools administered by or under the jurisdiction of State Departments of Education. There are approximately 130 such schools. The survey was designed and administered by the Elementary and Secondary Education Division.

12(b) The Office for Civil Rights will conduct the Elementary and Secondary School and the Higher Education civil rights surveys during Fiscal Year 1975.

12(c) The Civil Rights Survey of Area Vocational-Technical Schools was conducted without data processing and other resources that normally would be avialable under a contractual arrangements because sufficient funds were not available.

12(d) Essentially, NCES has provided OCR with information on educational universes for designing survey samples and for providing survey mailing labels. The two organizations also confer periodically to assure survey efforts are not duplicative. Discussions are underway to permit future increase in exchange of survey findings.

12(e) Survey costs are indicated above under individual surveys. For fiscal year 1970 and succeeding years, $500,000 has been requested and allocated for OCR's "Special Projects" fund. The fund covers survey and related data collection and processing activities.

13. Miscellaneous.

13a. *Why does there appear to be so little coordination between NCES and other governmental agencies which collect public data? Could not NCES benefit by sharing computer programs, data collection experts and common formats for analysis and publication? How much time is currently being spent by NCES in this kind of activity?*

The Center expends a very significant proportion of its efforts in coordination with other Governmental agencies. These coordination activities extend through all phases of Center planning, operations and publication.

The planning of data acquisition is a systematic process which solocits the data needs of Federal agencies through the Educational Statistics subcommittee of the Federal Interagency Committee for Education (FICE). Each agency is asked to suggest various ways in which additions or changes in proposed NCES projects could be made to better meet their organizations' data needs. Review and comment are also solicited regarding: timing; special formats; relative priorities, etc.

Extensive coordination also takes place in the development of the Handbooks for Standardization Terminology. The Center is in communication with virtually every government agency in developing the terms, classificatios and definitions in the Handbooks. A member of NCES has served on the OMB Interagency Standard Occupational Classification Committee since 1965, providing knowledge important to communication about classification of occupations.

A variety of instances of coordination with the Census Bueau also can be cited as examples of how the expertise and facilities of government agencies is utilized. Some recent cases are:

(1) Geographic skills of Census have been called upon in the school district mapping project.

(2) The trained field staff of Census Bureau has been employed to locate and interview survey projects in follow-up efforts on the Longitudinal Study of Educational Effects (LSEE).

(3) Census, NSF, and Bureau of Labor staff contribute professional skills through participation in RFP evaluation panels, and for advisory groups (e.g., LSEE) and by consultation on methdological or operational problems.

(4) The well established Current Population Survey mechanism is frequently utilized for identifying special subgroups of concern to NCES, dropoff of special questionnaires to those so identified, and follow-up of delinquent respondents (examples: survey of adult education in 1969 and 1972; pre-primary education; CCD survey of Educational Target Groups Age 17–25; educational and occupational experiences of recent college graduates). Editing and ADP services are often utilized as well.

(1) Specific and major examples of utilization of Census data include the basic demographic data used in NCES projections of educational statistics, and special tabulations of low income children used for Title I allocations.

In these contacts, NCES has taken an active lead in providing the substance for these supplements and have provided extensive technical consultation on survey "materials", e.g., questionnaires, enumerator instructions, and methodological checks needed to protect the integrity of the data. In addition, NCES took sole responsibility for the preparation of detailed analysis plans.

NCES contributions to Census should not be overlooked. Major contributions include:

(1) The majority of tables on education in the annual Statistical Abstract of the US are assembled from a variety of NCES surveys.

(2) NCES provided advisory services on the 1970 decennial Census, in reviewing questions and table shells during planning stages.

13–b.1 *The Consolidated Program Information Report (CPIR) survey has collected data on an annual basis for NCES at least the past three or four years. It purports to measure effectiveness and program evaluation of the major Federal titles for elementary and secondary information. If so, it should have been a major basis for discussion during the past year of legislative consideration of these titles. Instead, at the expense of hundreds of thousands of dollars for design, collection, and analysis, NCES has not yet published the full set of data from any of those years of expense and effort. How can this situation possibly be explained?*

At the outset, it should be noted that the first sentence of the question is somewhat inaccurate with respect to NCES involvement in the CPIR program.

NCES did *not* participate in the planning or execution of the CPIR in 1969-70. Furthermore, the 1970-71 CPIR was initiated and planned outside NCES; responsibility was transferred to NCES only after the survey was in the field. Thus, the 1971-72 survey was the first in which NCES participated from the start.

Because of serious flaws in the first two surveys, NCES has reluctantly concluded that data from these efforts should not be released. A contractor's report on the 1969-70 CPIR, "Children in Need and Federal Aid to Education" was submitted to the Office of Education. This report was sent to all program administrators with a request for review. The responses indicated that the report should be used only with qualification, because of ambiguous or inadequate standards, and unreconciled differences between the report and other sources of data. (A review of the report, along with a copy of the report, has been submitted to Congressional Staff.)

The design of the 1970-71 CPIR was also seriously flawed. A review of the survey initiated in the fall of 1973 led to the conclusion that many statistical standards were not met. These included problems with instructions and definitions, with sample design, with edit and validity checks provided to respondents, with procedures for editing and error resolution, with determining participants in groups that are not mutually exclusive, and with certain of the methods of analysis.

Apart from statistical and procedural difficulties, the most critical problem encountered in the CPIR results from the type of records maintained by respondents; in many cases such records have simply not been geared to provide participant counts and expenditure of funds by the dimension of pupil population groups and by the dimensions of services and activities. As a result, respondents must estimate by prorating or allocating along the dimensions called for. These practices and procedures vary considerably. In an effort to address the extent and seriousness of these problems NCES arranged for a validity study of the 1970-71 CPIR to be conducted under contract.

The validity study, though somewhat limited in scope, determined that the recordkeeping and estimation problems were severe. The costs of salvaging this survey in terms of the amount of interaction with sample districts to revise their input to the survey, if even possible at so late a date, and the cost of reprocessing the data, made it seem not cost-effective to undertake to reconstitute the survey.

The NCES efforts on the CPIR were concentrated on the 1971-72 survey. Experience with past CPIR's led to major design changes stemming from problems incurred in earlier CPIR's. Collection procedures were improved by providing technical assistance grants to States. Despite these efforts, there were numerous delays attributable to slowness in response from respondents in certain key States. In fact it was necessary for NCES to send staff to California, Georgia, Massachusetts, Montana and Vermont to obtain data from these States. The delays were further compounded by delays in access to the computer.

We are now receiving tabulations of the 1971-72 data and are carrying out reconciliation checks. Early releases of selected data from the survey are planned. The FY 1973 CPIR forms are being completed by respondents in the field at this time.

13.b.2 *The CPIR is not part of the FY 1975 budget—is this the NCES solution of the problem of evaluating Federal programs? If another survey is replacing the CPIR, what is NCES doing to make sure the same mistakes will not recur?*

Although responsibility for the CPIR and the School Surveys was transferred to NCES, the funding was not placed in the NCES budget but remained in the Evaluation budget. Funds for the program were made available in FY 1973. No funds, however, were made available in FY 1974, as the result of a sharp reduction in the appropriation for Evaluation in that year. It was, therefore, not possible to contract for a CPIR to be conducted in FY 1975.

A program-related survey is planned for FY 1976 to collect data on FY 1975 programs. Its dimensions will be contingent upon the program structure evolved from H.R. 69 and S. 1539.

The FY 1973 CPIR is now in the field. It reflects refinements made in cooperation with the States. It also includes additions made in response to data needs expressed by Federal program administrators, e.g., on Indian Education, a new program. The ample size will permit national estimates only. It is expected that useful trend data can be derived from the combination of FY 72 and FY 73 data.

We are designing a validity study of the FY 1973 CPIR which is expected to provide design guidelines and system recommendations for the survey in FY 1976 which will replace the CPIR.

13c. *The Elementary School Survey and the Secondary School Survey have collected data off and on for the past five years or so. They are the only existing surveys collecting data at the school, teacher, and pupil levels, and as such, they should be extremely important to current discussions of teacher effectiveness, school accountability, and educational achievement. Why hasn't NCES even released the data from these surveys, much less performed any analysis of the data?*

The Elementary School Survey of 1971 was the first in which NCES was involved. Moreover, planning, data collection, and much of the survey processing had been completed under the auspices of the Bureau of Elementary and Secondary Education before this survey was turned over to NCES. The Elementary School Survey of 1970 (like its precursors in 1968 and 1969) was conducted entirely by the Bureau. It was decided by the Bureau (before responsibility was transferred to NCES) that tabulations based on this survey would not be released.

As NCES picked up the responsibility for the 1971 survey, numerous problems became apparent—especially problems of design, editing and weighting. Design problems included inadequate definitions for many of the crucial terms. Reaching-Achievement test data from local systems using different tests were collected in advance of a means for valid comparisons; only later did Anchor Test Program results become available which now make possible such comparisons.

Editing and weighting problems were also extremely severe. Computer programs for editing and weighting had not been tested adequately by the contractor: NCES discovered resulting inconsistencies and initiated corrective measures. We are applying both contract and in-house resources to the effort, but have not yet solved the problems of data correction completely. The data has residual errors and its premature release would create more problems than it would clarify. By the same token, analytic efforts are not yet warranted.

NCES has contracted for redesign and pretest of a new survey of Elementary School Students to be conducted in fall 1974—the first to be done under NCES planning and direction from the beginning. The pretest is now in the field. In addition to contractor personnel, we have eight OE employees conducting site visits, which illustrates the NCES emphasis on technical supervision of contractor efforts and current attention to potential problems.

The Secondary School Survey, initiated in June 1970 in the Bureau of Elementary and Secondary Education, has never become operational. A very small pretest of collection procedures was conducted under NCES auspices in spring 1970. The contract which had originated in the Bureau, was plagued by a major change in the contractor's project staff in July 1972. Efforts to develop the design and subject matter contents were continued by the contractor through August 1973. At that time, the expectations that the first collection of the Secondary School Survey would be field tested in 1974 and carried out in 1975 was dropped, placing the project in a "hold" status, because we recognized need for substantial competent in-house survey staff to lead the project through a full field test and into full-scale implementation. The staff was not available, and no funds were allotted to this effort from the Evaluation budget. Products from this development effort, for use when resources become available for conducting a Secondary School Survey, include "attribution lits" (which begin with specific policy issues, identify intermediate quantitative-linkage-questions, and list specific data collection items which are attributed through the linkage questions to one or more policy concerns,) draft survey instruments, draft analysis plans, and draft operational procedures.

13d. *The financial portions of the Elementary-Secondary General Information System (ELSEGIS) provide the only detailed accounting information of receipts and expenditures of a sample of school districts. It is an annual survey. Yet in May 1974, the last ELSEGIS school district financial information that NCES has published in printed form is for the 1968–69 school year. Both current data and data analyses were essential for discussions this year of*

ESEA Title I formulas, yet little assistance was provided by NCES which is supposed to be the central government collection agency for educational data. How can NCES explain this sorry state of affairs? How can it be more helpful in the future?

The delay in publication of ELSEGIS data for 1969–70 and later was the unforeseen and unfortunately cumulative result of a combination of factors: A decision to increase the 1969–70 survey sample three fold, a decrease in in-house staff, and the failure of a contractor.

Our decision to increase the sample size for the 1969–70 survey to 5100 districts, vs. the 1200 to 1800 used in earlier surveys was based on reasons which seemed compelling, specifically:

(a) To meet the request of the Kelly Committee for a canvass of all school districts with enrollments of 5,000 or more.

(b) To have a State representative sample as a common date source for comparison of individual districts or a group of districts (e.g., large city districts) against the State average.

(c) To have an adequate data base to meet the needs of the several important education finance projects in operation at that time, e.g., the Commission on School Finance and the National School Finance Project.

(d) To provide an adequate data base to be analyzed against the social and economic data in the decennial census data (1970).

NCES had assigned a half-time senior professional and a full-time junior professional to monitor the contract for ELSEGIS. When the contractor's work was found to be largely unsatisfactory this imposed demands on the in-house staff which they could not reasonably meet without the assistance of several additional staff members. NCES personnel ceiling was reduced during this period so it was not possible to assign additional staff to ELSEGIS without imperiling other projects of equal of greater priority. Had we been able to predict forthcoming staff problems, we might very well have reconsidered the decision to expand the survey. After the clean data base was finally attained (in December 1972), the same contractor caused a delay of the prepared publication because many of the listings and (summary tables and the text) were unsuitable for publication and had to be redone in-house. The in-house work, in turn, had to be set aside frequently while work was being done on ELSEGIS IV and other higher priority tasks. To the extent that ELSEGIS III was not set aside it had residual effects on the processing of subsequent ELSEGIS surveys. The problems were compounded by a reorganization of USOE's ADP unit, reducing in-house staff and requiring most programming to be done on contract. (The fact that neither then nor now does the NCES have its own ADP staff has, incidentally, been a handicap in this and other surveys.)

The ELSEGIS III data have been provided to the Congressional Reference Service of the Library of Congress in machine readable form, and detailed computations have been made using the sample data provided. ELSEGIS data on revenue by source, expenditure by account, and staff by type and education have been matched with various population characteristics from the 1970 Census for all districts in the ELSEGIS sample with enrollments of 300 or more.

Beginning with FY 74, the LEA finance data will be collected by the Governments Division of the Bureau of the Census. For many years the Governments Division of the Census Bureau on its Form F–33 had been collecting from independent school districts some of the data contained in the ELSEGIS LEA finance form. The Census Form has been expanded to include the detail required by NCES and coverage has been expanded to include "dependent school systems."

It is expected that the cooperative arrangement with Census will greatly improve the timeliness of data availability and publication. A major factor leading to greater timeliness is the Census in-house capacity for data editing and processing. For example, it is our understanding that Census has an average of 15 to 20 data editors working on LEA financial data. Furthermore, the field staff of the Census Bureau is a major asset for nonresponse follow-up, and for going directly to LEA's if the SEA is unable to provide timely response.

Transferring this data collection to the Census Bureau was contrary to the recommendation of the Council of Chief State School Officers which had recommended that the Census form be incorporated in ELSEGIS and collected by OE. With limited available manpower it was impossible for NCES to meet the time schedule imposed by the Census of Governments.

13e. *Much of the essential work of NCES is contracted outside the government. This would include studies on the need to redesign surveys, the design of surveys, studies of user needs, pre-testing and field testing of surveys, the actual surveys themselves, the collection and management of collected data, the plans to analyze the data, the analysis of data, and the format and schedule for publication itself. As a result, if any expertise is obtained at all it is by the contractor and not NCES. The Contractor ends up knowing about the important aspects of State and local education and the measurement of educational achievement, while NCES ends up with a staff able to write proposals, monitor contracts, and possibly publish the results. How can NCES justify this situation?*

It is true that "much" essential work is performed by contract but not all. In many instances NCES personnel are performing the tasks enumerated. Whenever there is a choice it is a matter of policy that NCES personnel perform the design and planning taks and contract for the execution tasks. Every function listed has been performed by NCES personnel in some instance or other. It is also true, however, that as the responsibilities of the Center have increased, with no corresponding increase in staff, and with a reduction in salary and expenses funds available for overtime and for temporary employees, NCES has had no choice but to perform many tasks by contract.

This is not only more costly to the government but it adversely effects timeliness. NCES believes on the basis of its experience that there are significant advantages in both economy and efficiency in developing and maintaining strong in-house capabilities. In-house capability permits OE direct control of its projects and the manner in which the work is performed. It permits data collections to be done within a shorter time period than is possible when a contract must be developed starting from the RFP stage. In-house capability also permits flexible use of resources, allowing rescheduling, accelerating, or otherwise responding to changing priorities. Improved skills learned on the job are not lost because the learner is on the contractor's staff and is later reassigned. Professional saff can be more easily recruited when there is professional work to be performed by the in-house staff and an opportunity for professional growth.

13f. *What have been the budget requests for the National Center recommended by the Office of Education to the Office of Management and Budget for the last five fiscal years, including the recommendations for fiscal 1975?*

The program budget requests are given in the first table below. The second table shows the requested and authorized NCES positions.

Departmental program budget request for NCES for the fiscal years 1971–75

[In thousands]

Fiscal year:	*Request*
1971	$4,000
1972	4,000
1973	[1] 29,900
1974	31,050
1975	24,570

[1] Includes $1,000,000 for the educational manpower statistics program; $7,250,000 for NAEP and $500,000 for the common core of data (CCD) program. Funds for each of these programs were officially transferred and carried as part of the national center's budget request for the first time in fiscal year 1973.

REQUESTED AND AUTHORIZED NCES POSITIONS FOR FISCAL YEARS 1971-75

	President's budget	Authorized OE ceiling
Fiscal year:		
1970	177	154
1971	167	146
1972	173	[1] 153
1973	185	153
1974	165	169
1975	170	170

[1] Includes 18 positions transferred to NCES with new program responsibilities for the national assessment of educational progress, the educational manpower statistics program and the Federal-State task force program.

APPENDIX II

[Letters received in response to information solicited by Chairman Perkins follows:]

CONGRESS OF THE UNITED STATES,
HOUSE OF REPRESENTATIVES,
COMMITTEE ON EDUCATION AND LABOR,
GENERAL SUBCOMMITTEE ON EDUCATION,
Washington, D.C. May 7, 1974.

DEAR FRIEND: Today the General Subcommittee on Education held a hearing on H.R. 13991, a bill requiring the Department of Health, Education, and Welfare to conduct a study on the best means to improve the collection and dissemination of educational statistics.

I introduced this bill and called the hearing because I believe that the Federal Government presently is doing a very poor job in collecting and disseminating educational statistics and that we must improve the situation as soon as possible. I would appreciate receiving your opinion on the bill and on the following additional matters:

(1) What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards the Federal role?

(2) How can this situation be improved?

(3) What opinion, if any, do you have on the provisions contained in S. 1539 creating a new Federal agency for educational statistics?

Since it is not possible for us to have extensive hearings on this issue, I would appreciate receiving a statement from you which we could insert in the hearing record. If you are to prepare such a statement, please submit it to the office of the General Subcommittee on Education by June 10th.

Sincerely,

CARL D. PERKINS, *Chairman.*

HOUGHTON MIFFLIN CO.,
Boston, June 17, 1974.

HON. CARL D. PERKINS,
Chairman, Committee on Education and Labor, General Subcommittee on Education, House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN PERKINS: Thank you for your letter of June 7. There is no question that a capability for easy delivery of educational statistics is needed by the Federal Government as well as state and local government agencies and a broad range of businesses that service the multi-billion dollar education market. Presently, Market Data Retrieval provides statistics to businesses and state agencies, but not the Federal Government.

Perhaps the reason the Federal Government is not satisfied with the statistics it is receiving is that the Federal Government is not the appropriate institution to provide this kind of service.

Private business is now capable of providing accurate and meaningful data and educational statistics. There is, then, no real need for the government to underwrite the cost of an entire agency. By using existing businesses, costs and taxes will be reduced since the government must only pay for the statistics it uses and not for the entire overhead of the operation.

Further, you can be assured of first-rate statistics from a private concern since its entire existence depends on its ability to satisfy its customers.

And last, but certainly not a point to diminish, business is an important social institution which generates the needed profits which fuel every section of our society. If the job of gathering statistics on education for the Federal Government is given to private business, everyone is better served.

In closing, I feel we both agree that sound and accurate educational statistics are important to government and business. Market Data Retrieval's entire existence is now justified by the accurate and dependable data it collects, computerizes, and sells to customers. Only to the extent that its customers are satisfied does it thrive and prosper.

There is no reason why the Federal Government should not receive the kind of educational statistics it needs, and Market Data Retrieval can provide better data at a less expensive cost.

Sincerely,

ROBERT JANAS,
Director, Special Corporate Projects.

EDUCATIONAL TESTING SERVICE,
Princeton, N.J., June 19, 1974.

Hon. CARL D. PERKINS,
House of Representatives,
Rayburn House Office Building,
Washington, D.C.

DEAR MR. PERKINS: Several of my colleagues and I have had an opportunity to study H.R. 13991, the bill introduced by Mr. Quie and you to provide for obtaining certain educational statistics. We believe it would provide a significant advance in improving the information available to educational leaders in this country.

The proposed collection of educational statistics is a feasible and necessary step for American education. There is little doubt that the development and evaluation of Federal, state, or local programs to improve education would be substantially enhanced by the availability of systematic data on the status of education. Efforts to provide statistical information have, of course, been sponsored by HEW in recent years and H.R. 13991 would encourage a more comprehensive effort in this area.

The provision that the effort be developed in cooperation with State educational agencies is an excellent step toward strengthening State resources for planning educational innovations and change. Certain statistics bearing on critical characteristics of education should be collected uniformly, but each state could also provide for the concurrent collection of data bearing on its special interests.

The statistics collected uniformly would probably include information on education by level (e.g., elementary, secondary, postsecondary), by type of institution (e.g., public, private), by type of instructional activity (e.g., formal, nonformal), by student and teacher characteristics (e.g., minority students), and several other categories. In addition, it would be essential in the long run that indices bearing on the *quality* as well as the *quantity* of education be developed.

I am particularly favorable to the provision (p.2, line 6) for analysis and dissemination of the data. Analytic studies, integrative reports, and comparative studies over a period of time will be essential in teasing out the significance of the data collected.

One suggestion for a wording change would be to insert (p.2, line 7) the words "evaluate and" before the word "operate." The evaluation of the success of programs introduced in response to policy determinations is a much-neglected but vital step toward improvement.

Another possible amendment would be to add to the concluding sentence (p.2, line 20) a clause such as "with all appropriate protection against unwarranted invasion of privacy." This may be self-evident but I wonder if omission of an explicit *caveat* might lead to unproductive debate and opposition.

We look forward to the passage of H.R. 13991 as a significant contribution to understanding and improving education. If we can be of assistance to you in your endeavors, please let us know.

Sincerely yours,

WILLIAM W. TURNBULL, *President.*

EDUCATION COMMISSION OF THE STATES,
Denver, Colo., May 20, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education and Labor, House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR MR. PERKINS: I am in receipt of your letter of May 7th, eliciting an expression of opinion on HR 13991 and its provisions for the collection and dissemination of education statistics. The Education Commission of the States, since its early beginnings, in conjunction with the National Governors' Conference, has urged that the Congress recognize the need for vastly improved systems for data collection and technical assistance to the states and local units of education at all levels. Indeed, we see this as a major service of primary significance—one which the federal government is uniquely qualified to perform.

In support, I am enclosing excerpts from a Policy Position Paper adopted by the National Governors' Conference at their annual meeting in 1973; and the position that ECS has historically supported in the matter under consideration.

Excerpt from Policy Position Paper, National Governors' Conference, 1973:

> "11. Provision in federal programs for joint federal-state-local development of standardized statistical data and other information necessary for sound analysis of educational needs and programs. Such standardized and comparable data is essential for educational planning at all levels of government. We urge the Administration to provide adequate funding for the National Center for Educational Statistics, and for state efforts to redesign and clarify state and local inputs into the National Center."

Excerpt from Policy Position Paper on Federal Aid to Education, Education Commission of the States, 1974:

> "5. DATA COLLECTION AND TECHNICAL ASSISTANCE
>
> "A portion of each year's federal education appropriation—perhaps 10 per cent—should be reserved for the discretionary use of the U.S. Commissioner of Education for the following purposes:
>
> "(a) Improving USOE Data-Gathering Capacity. State and local decision-makers are in need of management information such as data related to school finance and the excess cost of special programs. Information will be needed to implement any federal program of consolidation. The ability of USOE to provide this urgently needed information should be improved.
>
> "The federal government should undertake interagency coordination between the Census Bureau, the Bureau of Labor Statistics, the National Center for Educational Statistics and other agencies concerned with statistics in related areas. Such coordination would encourage education statistics to be used in association with related statistics on, for example, property tax assessment, administration, income, labor market analysis and projections."

May I also point out that the Syracuse University Research Corporation report to the President's Commission maintained that USOE statistical reports were neither current enough nor analytic enough to be useful to policymakers.

It seems to us that what is needed is a process for developing a system designed to yield information relevant to policy questions at several decisionmaking levels.

It could include for example, a process for describing legislative information needs at both the state and federal levels; a means of collecting information at both levels that would provide enough flexibility to respond to policy issues as they arise; a means of performing analytic work to show the significance of the data collected and a means of governing compatibility between statistics compiled by other federal agencies for the purpose of developing badly needed capabilities for early identification in emergent problem areas.

Respectfully submitted,

WENDELL H. PIERCE,
Executive Director.

COUNCIL FOR AMERICAN PRIVATE EDUCATION,
Washington, D.C. May 31, 1974.

Hon. CARL D. PERKINS,
House of Representatives,
Washington, D.C.

DEAR SIR: I welcome the opportunity to respond for this Council to the questions you have raised with regard to the best means to improve the collection and dissemination of educational statistics. The matter is one of major and pressing significance for the private elementary and secondary schools of the country, and I will confine my remarks to matters related to these schools.

Question: What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards the Federal role?

Current and accurate national statistics with regard to private elementary and secondary schools are not now available, in spite of the fact that they are of obvious importance to those who wish to understand the role of these schools in American education, their contributions to American society, and their needs. Such statistics are urgently needed. Without them, the intelligent consideration of a broad range of significant educational topics is severely handicapped.

Not only are such statistics not now available, but there is no present plan to assure that they will be in the future, although the National Center for Educational Statistics, I understand, has the matter under consideration.

Question: How can this situation be improved?

The approach suggested in your bill, H. R. 13991, should serve, in the long run, to improve the situation. The matter is complex, and careful preliminary consideration seems essential to the efforts which you believe—and we agree—must be made to improve the situation as soon as possible.

On the basis of repeated past experience, when the response to the statistical concerns of private schools has been consistently inadequate, we respectfully urge wording in the bill which will direct that the plan to be developed shall include: provisions to collect basic data on private elementary and secondary schools as frequently as it is collected for public schools on these levels; and provisions to include appropriate private school representatives in the cooperative development of the "comprehensive plan" described in subparagraph (4).

Question: What opinion, if any, do you have on the provisions contained in S. 1539 creating a new Federal agency for educational statistics?

The proposal, in S. 1539, to create a new Federal agency to handle educational statistics involves management considerations beyond my sense of comfortable competence. My initial reaction was favorable; my second thought was to wonder what really would be accomplished; and my present feeling is that a decision to create another agency should be made only if a careful study should produce compelling reasons to believe that the quality of the statistical services to education would be improved more by the creation of a separate agency than by modifying present structures and procedures within the National Center for Educational Statistics and providing the necessary funding to achieve the desired ends.

Thank you for the opportunity to participate in the Subcommittee's consideration of this important matter. We stand eager to cooperate in any possible way with your efforts to improve the present unhappy situation with regard to educational statistics.

Very truly yours,

ROBERT L. LAMBORN,
Executive Director.

COUNCIL ON LIBRARY RESOURCES,
Washington, D.C., May 31, 1974.

Hon. CARL D. PERKINS,
Chairman,
General Subcommittee on Education,
Rayburn House Office Building,
Washington, D.C.

DEAR SIR: I appreciate your thoughtfulness in wriitng me on May 23 enclosing a copy of H.R. 13991 and asking for my comments on educational statistics. Specifically I would respond:

(1) The collection and dissemination of educational statistics can be improved.

(2) Methods should be found to provide promptness, completeness, and regularity in the collection and dissemination process.

(3) I would agree with the proposal for having a study made of S. 1539.

Sincerely yours,

FRED C. COLE.

NORTHERN ARIZONA UNIVERSITY,
Flagstaff, Ariz., May 21, 1974.

Mr. CARL D. PERKINS,
Chairman, Committee on Education and Labor,
General Subcommittee on Education,
Rayburn House Office Building,
Washington, D.C.

DEAR MR. PERKINS: Thank you for your letter of May 7, and the copy of H.R. 13991. I think it is an excellent proposal, and I am especially pleased to see paragraphs 3, 4, 5 and 6. Possibly this approach—allowing HEW to prepare its own plan—has advantages over the new NCES provision in S. 1539. On the other hand, there is no question as to the feasibility of doing what your bill calls for; the only question is how to go about it.

You are certainly correct in your statement that the Federal Government is presently doing a very poor job in collecting and disseminating educational statistics, and I agree that improvement as soon as possible is urgently needed. Here are my views on the specific questions you asked:

1. The collection and dissemination of educational statistics in the U.S., especially as regards the Federal role, at the present time is wholly inadequate. NCES makes occasional surveys, almost invariably without adequate funds to get statistically valid data, and hampered by OMB to an extent that the data they do get are hardly worth the effort. There is a better way, and I have suggested what I consider to be a much better way in my attached statement for the hearing record on H.R. 13991.

2. The situation can probably only be improved by collecting source data only from educational institutions, omitting private identification, and transmitting these in unit form on magnetic tape to the States and from the States to the Federal Government. This too, is described in my attached statement.

3. I am very much impressed by the new Federal agency for educational statistics contained in S. 1539. It should certainly be capable of doing the job. There are possibly two concerns I would have with it: It may be more elaborate and more costly than necessary; and being a Federal agency it may attempt to dictate to the States, whereas a genuine partnership is needed and is possible.

I certainly appreciate this opportunity to give you my views on educational statistics and reporting. The attached statement contains a more detailed explanation of what I believe we should be attempting to do.

Sincerely,

ARTHUR M. LEE,
Director, Project Baseline.

Enclosure

STATEMENT BY ARTHUR M. LEE, DIRECTOR OF PROJECT BASELINE, NORTHERN ARIZONA UNIVERSITY

Mr. Chairman, I appreciate this opportunity to express my views on H. R. 13991. It is, in my opinion, an excellent bill. Before commenting in detail, I would like to explain the reason for my interest.

Project Baseline is a national study of vocational education and manpower training requested by the House and Senate Appropriations Committees to gather data which Congress needs but cannot obtain. It is in its third year. We have collected everything the States know about their programs, which in many cases goes considerably beyond what the Federal Government has known, and are compiling and reporting the results.

In the process we have become increasingly familiar with the way information is being channelled all the way from local schools to the Office of Education and to Congress. We have become equally familiar with the problems inherent in present reporting systems which prevent information from reaching the Office of Education and the Congress.

Two years ago I suggested to the Appropriations Committees that we explore the possibility of collecting statistical data as a product of the record keeping processes in local schools through automation. We were asked to do so, and the results of our investigation appear very encouraging.

I am now writing a report to be published soon based on the result of our exploratory efforts entitled: "A Data Base for Vocational Education and Manpower Training." The data base, designed for expansion to include all education, should contain four essential principles:

1. It should be built on the foundation already established by local schools and the States. We should not duplicate or replace what they have already done. We do not have to, and it would be an inexcusable waste of time and money to do so.

2. The Federal Government should work through the State agencies, not directly with local schools. Every State needs the same kind of an information system as the Federal Government needs, and it would be extremely ill advised to by-pass this level.

3. Use source data, not secondary statistics. By source data I mean unit data elements from local schools transmitted on punch cards or magnetic tape to the State level where they are used in the States' management information systems, and to the Federal level for tabulation and analysis nationally. A statistical sample may be used and is virtually mandatory at the Federal level in view of the volume of data to be handled, but it must be a sample of unit data elements, not of aggregate data.

4. Never collect, at the Federal level at least, names and addresses or identifying numbers. It is not necessary, and the confidentiality of personal records should be absolutely protected within each State and preferably at the source.

A number of excellent information systems have been developed in individual school districts and post-secondary institutions, and a number of States are moving in the direction of comprehensive automated statewide systems. Project Baseline is suggesting a national automated data base of approximately forty unit elements of program, student, and personnel information. Any of the systems already developed which contain these elements—and some of them are in every system—can supply those available and add the others. During the next year we hope to identify the amount and kind of automation, cost of additional hardware, and cost of operation needed in every State in the country to fully implement this kind of a system at the secondary and post-secondary levels.

We are working closely with staff personnel in the Office of Education, National Center of Educational Statistics, and Bureau of Adult and Vocational Education.

In specific reference to H. R. 13991, I would like to support particularly paragraphs 3, 4, 5 and 6, with these additional comments.

Paragraph (3): The cost of improving and automating State and local educational agencies' statistical and data collecting activities is probably too great for these agencies to do it by themselves. Most of the large urban school districts and post-secondary institutions are already partially automated, some of them extensively. Most of the States have some degree of automation. But those still using manual record and information systems are usually unable to change because of the cost. Some of the cost of implementing and operating a good automated system in each State, I feel, will have to be assumed by the Federal Government.

Paragraph (4): I am strongly in favor of a comprehensive plan in cooperating with State education agencies, as I have indicated above. At the same time, I believe a few principles should be kept in mind and not compromised by too much planning. One is that the system should be highly flexible, not based on any particular set of forms, hardware, software, or final list of data elements. Another is unrestricted access to the basic data elements by Congress and the public, with no agency in a position to monopolize or control the information released. This is partly covered in paragraph 6. Another principle to be kept in mind is that the system should be relatively simple and highly practical, with relatively few data elements and as free as possible from interference by the bureaucracy at any level. Another principle is that some balance of Federal support and Federal regulation must be achieved which leaves the

States extensive latitude in designing their own systems but not in the quality of the data they supply. Finally, there must be uniform national standards of definitions of data elements. This need not destroy the healthy variations from one school to another and one State to another in American education, but for purposes of reporting an agreed upon set of national standards must be used.

Paragraph (5): The coordination of statistical information gathered with other Federal agencies is extremely important and should be comparatively easy. In view of the experience of Federal agencies having difficulty in coordinating their activities, however, this may require special effort. Possibly a consortium of Federal agencies supplying and using statistical data should be established by law to arrive at the mot effiecient means of coordination and to oversee its implementation.

Paragraph (6): This paragraph is also quite important. There is sometimes an unfortunate tendency by executive agencies to take a proprietary attitude toward the public information in their possession. "Managed" information is one of the evils of many governments, and public relations type reports by government agencies are widespread. There will almost certainly be a strong effort by executive agencies at both the State and Federal levels to retain some kind of policing or gate keeping power over educational statistics, and I hope Congress will insist on both the letter and the spirit of this provision. The data which will come from the system under consideration should at all costs be honest.

American Association of Community and Junior Colleges,
Washington, D.C., May 31, 1974.

Hon. Carl D. Perkins,
Chairman, Subcommittee on Education,
Rayburn House Office Building,
Washington, D.C.

Dear Congressman Perkins: This letter is in response to yours of May 7 regarding H.R. 13991, relating to a study on improving the collection and dissemination of educational statistics.

I will respond to your specific questions.

1. It would seem that the present state of collection and dissemination of educational statistics in the nation, which should be a Federal responsibility and was, I believe, the first and original mandate of the Office of Education, is not good. The numbers of questions asked is limited, and most especially, the time lag in producing necessary data is so great as to render the data almost useless. The current National Center for Education Statistics cannot be relied upon for current educational data, nor is it able to provide information on a wide variety of questions for which answers are urgently needed for legislative and other policy purposes. I understand that the data collected by the national Commission for the Financing of Postsecondary Education (most of it not from NCES sources) has been deposited with NCES. This is, of course, the logical place for such data to go, but there are grave doubts that NCES will be able to handle the data and to keep it current.

2. Probably the main problem with NCES is underfunding, which makes it very difficult for it to keep its mandate. With more staff to collect and process data, readier access to computers, and greater funding available for grants and contracts for outside statistical research I am sure the situation would be greatly improved. I do not have personal knowledge of the quality of the existing personnel at NCES and thus do not have an opinion as to whether the present staff has the aptitude and imaginativeness to tackle its job competently. Probably one problem is that NCES does not now have enough status and authority to command greater attention among USOE priorities. I note that its director is of somewhat lower rank than the heads of other bureaus and centers in USOE, and would take this to be a significant indicator of its status.

3. The Senate in S. 1539 has attempted to tackle the problem by separating the National Center for Educational Statistics from the Office of Education and making it a co-equal body in HEW's Education Division, along with the National Institute of Education. This approach to the upgrading of NCES merits serious consideration. While it is entirely possible that a greater infusion

of funds and staff into the present system of organization would be all that is needed, it is a fact of Federal life that a separate agency gains a momentum of its own and is likely to get more attention and more funding than if it were a part of a larger whole. For this reason alone, the Senate's proposal may be worth enacting.

As other significant points about the Senate proposal I would note:

1. The National Board for Educational Statistics, to set general policy directions for NCES, will be composed of public members (of a nature and background undesiganted) who, if they are selected for their concerns in the field of education, will provide guidance on the concerns of the field with regard to data and statistics. Additionally, as public members they would be free of federal constraints and pressures. The ex-officio members are well selected for their collective breadth of knowledge on matters of education and data.

2. The staff of the NCES is upgraded through Presidentaial appointment and high federal rank, and even the deputy director would be of higher rank than the present director of NCES. Thus, NCES administration will inevitably become more costly—a necessary byproduct, I suppose, of a higher priority.

3. A fairly free flow of information and data is mandated by the proposal in terms of NCES' access to information it needs, and oothers' access to information that NCES has available. Cooperative relationships between NCES and other federal agencies, the Congress, and the public, could be of very great benefit if they actually come to pass.

4. Probably the most significant part of the proposal is money. Whereas $11.6 million is asked for fiscal 1975 for the current NCES research and survey operations (up from $8.8 million in fiscal 1974), the proposal would authorize $20 million for fiscal 1974 (almost ended) and $31.6 million for fiscal 1975. With that amount of money, I am sure the present NCES could do better than it now does—the question is whether such sums would be appropriated for a subunit of the Office of Education.

5. One possible criticism of the Senate proposal is its requirement that the new NCES undertake three specific studies: (1) a survey at least *every three years* of school aged children, with a report *at least annually* on the results(!); (2) a study of Federal property and its relation to the impact aid program; and (3) a study designed to improve measures of poverty to be used for Title I of ESEA. While I do not dispute Congress' need for this information, for obviously it would back up major legislation, I think the question should at least be raised whether a ready-prepared research agenda would deprive the newly-formed Board of NCES of its freedom in determining priorities for action. It is fairly clear that one of the problems affecting the efficiency of the National Institute of Education has been the priorities it "inherited" upon its formation, which has prevented NIE from making its own determinations. I think an estimate of the costs of making these three mandated studies should be considered in relation to the proposed total authorization and realistically expected appropriation to see whether they would consume an undue proportion of the funds available to the fledgling agency.

Mr. Chairman, I appreciate having the opportunity to comment on this issue, and hope you will find some of these remarks helpful.

Sincerely yours,

CLAIRE T. OLSON,
Associate Director,
Governmental Affairs.

DISTRICT OF COLUMBIA COMMISSION ON ACADEMIC FACILITIES,
GEORGETOWN UNIVERSITY,
Washington, D.C., May 27, 1974.

Hon. CARL D. PERKINS,
U.S. House of Representatives,
Washington D.C.

DEAR MR. PERKINS: This communication is in reply to your letter of May 7. I welcome the opportunity to comment on H.R. 13991 and other aspects of educational statistics.

I feel that a study of the collection and disseminatiioon of educational statistics, as contemplated in H.R. 13991, is needed. I question however, whether a study conducted by the Department of Health, Education, and Welfare will produce the desired results. One alternative would be to have the study done by the General Accounting Office. Another approach might be an independent commission similar to the National Commission on the Financing of Postsecondary Education, which recently completed its work.

Such an independent effort could be very helpful in reviewing the mission and priorities of the National Center for Educational Statistics. Such limited review of the work program of the Center as I have done indicates a relatively heavy emphasis on development statistical research. Clearly, the emphasis should be on the collection and dissemination of descriptive and operational educational statistics on a timely basis.

All of us are aware that much of the statistical output of the Center is obsolete for program planning purposes by the time it is disseminated. This inordinate delay seems inexplicicable. The situation certainly could and should be improved.

One vital federal role in educational statistics is to produce the data needed by the Congress in developing and reviewing national objectives and priorities in education. The Center should also provide leadership and technical assistance to state agencies and individual institutions in the collection of educational data.

In my opinion the data needs of the federal government, the states, and individual institutions and administrative units are not materially different. Greater detail of course, is needed at the local level, with progressively more aggregation for state and federal purposes. The National Center for Higher Education Management Systems is using this approach in the development of management information systems for higher education.

The creation of a new federal agency for educational statistics, as provided for in S. 1539, should produce positive results. Such an agency should be more responsive to the will and needs of the Congress, the education community, and the general public.

I would also urge greater reliance on state agencies in the collection of educational statistics. For the past several years the State Higher Education Facilities Commissions and their national Association, through a non-profit corporation, Higher Education Facilities Services, Inc., have collected and edited data on the inventory of academic facilities in the nation. I have participated in this effort as Chairman of the Facilities Commission for the District of Columbia. The Center is provided a "clean" computer tape containing the entire national academic facilities inventory. Experience has shown that this approach produces more accurate data much more promptly than either the use of private contractors or the Center attempting to deal directly with almost 3,000 institutions of higher education.

Sincerely,

T. BYRON COLLINS, S.J.,
Chairman.

COMMONWEALTH OF VIRGINIA,
STATE DEPARTMENT OF EDUCATION,
Richmond, June 3, 1974.

Hon. CARL D. PERKINS,
Member, Congress of the United States,
Rayburn House Office Building,
Washington, D.C.

DEAR CONGRESSMAN PERKINS: Thank you for your letter of May 14, giving me an opportunity to express my views on H.R. 13991 and S. 1539.

I believe Senator Pell's measure has some merit. I refer particularly to the interagency committee set forth in the bill. The Committee on Evaluation and Information Systems, of the Chief State School Officers, is presently exploring the possibility of a closer relationship with Federal agencies other than the Office of Education. All Federal agencies need to know what state and local statistics are readily available and to expect data furnished to any agency to be similar in definition and format; for this reason I am interested in Senator Pell's bill. However, the proposal to establish a new statistical center does not, in my mind, solve the problems of collecting and disseminating educational statistics by the Department of Health, Education, and Welfare. In addition, the bill proposed by Senator Pell might make it necessary for the state and local agencies to begin anew the struggle to determine how and what information is to be furnished to the Federal agencies.

With regard to the collection and disemination of data, it is true on several occasions the Office of Education has asked for data that are either non-standard or impracticle. The returns of the results of OE surveys are usually received after a lapse of two or three years. The tardiness of the returns makes the results outdated and therefore useless. I want to point out, however, that through the Chief State School Officers' Committee on Evaluation and Information Systems, a rapport and an understanding have been established. This accomplishment is beginning to bear fruit.

I am very much in support of your Bill H.R. 13991. A study by the Department of Health, Education, and Welfare would continue the working relationship already established by CEIS and OE.

I hope that demands for statistical data from state and local school systems by other Federal agencies and the number of such demands will also be a concern of any study.

I trust that Bill H.R. 13991 will be successful.

Sincerely,

PHILIP F. BOEPPLE,
Supervisor of Special Studies.

THE UNIVERSITY OF MICHIGAN,
SCHOOL OF EDUCATION,
Ann Arbor, Mich., May 24, 1974.

Hon. CARL PERKINS,
Chairman, House Committee on Education and Labor,
House of Representatives,
Washington, D.C.

DEAR CARL: This will acknowledge receipt of your recent letter asking for my comments on the bill which you introduced with Mr. Quie regarding the collection of educational statistics. I will study this matter carefully during the next few days and try to send you a reply by June 10 as you requested.

I intend to consult with some of my fellow Deans of the Schools of Education on this matter.

I believe that one of the reasons why educational statistics have not been as comprehensive or as prompt in their publication as desirable has been due to the inadequacies of the appropriations to the Office of Education. I suggest that your staff make a careful study of the appropriations experience at all of the various stages during the past five years in order to see what the facts are regarding this matter. Included in this staff review should be the role of the Office of Education, the Secretary's office, the Budget Bureau, as well as the House and Senate Appropriations Subcommittees.

With best personal wishes,

Sincerely,

WILBUR J. COHEN, *Dean.*

THE UNIVERSITY OF THE STATE OF NEW YORK,
THE STATE EDUCATION DEPARTMENT,
Albany, June 4, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education,
Rayburn House Office Building,
Washington, D.C.

DEAR CONGRESSMAN PERKINS: This is in response to your letters of May 7 to Ms. Miriam A. Kazanjian and May 14 to John W. Polley relative to H.R. 13991. The comments are submitted for inclusion in the hearing record as the official position of the New York State Education Department.

We are encouraged by the provisions of the bill. A comprehensive study of the efforts of all Federal agencies in collecting educational statistics is long overdue.

We are especially pleased by the sections of the bill which recognize the important role played by state and local education agencies, for it is they who are the ultimate suppliers of data. The early involvement of these agencies, as well as other concerned groups, in the development of any proposed system and the provision of technical and fiscal assistance to them are prerequisites to the success of the project.

From the viewpoint of state and local education agencies the present system appears uncoordinated and redundant. In too many instances there is little or no justification for the information being sought and there is a lack of appreciation of the burden being placed on those who must supply the data. These problems exist within and across units of the Office of Education as well as other units of HEW. Agencies such as the Equal Employment Opportunity Commission and the Bureau of the Census also add complexity to the problem

Federal agencies requesting information must be made to provide more adequate justification for their proposed activities. Such justifications should be based on the uses to be made of the information as they relate to policy issues or *absolute* statutory requirements.

Federal agencies must work internally to lighten the data burden in the field and not wait for "watchdogs" to do it for them. At the same time, they must participate in these endeavors with state and local education agencies on the basis of an equal partnership. They must accept the existence of groups such as the Council of Chief State School Officers' Committee on Evaluation and Information Systems and actively seek the participation of their members. It would also seem appropriate that the coordination for the collection of *all* educational statistics should reside in one Federal office. Whether such centralization should be accomplished through the creation of a new agency (as proposed in S. 1539) is another question.

An agency already exists within the U.S. Office of Education—the National Center for Educational Statistics—which could perform that function if it were truly given the responsibility to govern and the authority to act. Without such resuonsibility and authority the system will fail regardless of whether it is housed in a new agency or an existing one. We are also fearful that the creation of another agency would only increase the Federal data burden by failing to adequately eliminate or limit the data collection activities of the Office of Education.

In summary, we support the concepts proposed in H.R. 13991. We urge that all efforts be directed toward the coordination of all Federal data collection activities related to education and toward the assurance that information requests are absolutely essential and fully justified.

Faithfully yours,

EWALD B. NYQUIST,
Commission of Education.

TESTIMONY BY DR. EDWIN P. ADKINS, ASSOCIATE VICE PRESIDENT RESEARCH AND PROGRAM DEVELOPMENT; TEMPLE UNIVERSITY, PHILADELPHIA, PA.

To: General Subcommittee on Education

Mr. Chairman: Thank you for the opportunity you have given me to comment on H.R. 13991. My reaction is most positive. I believe the Bill, if enacted into law, might well result in a system for collecting, analyzing, and disseminating educational statistics which would be most beneficial to the entire nation.

The problem up to the present time is that statistics come from all sources, are analyzed inefficiently, and are poorly disseminated. We need one central source for statistics on which we can depend. At the present time it is too easy to misinterpret the statistics which are available. For example, there is a commonly accepted myth that there is a severe over-supply of teachers for our elementary and secondary schools. While this may be true in the aggregate, it is untrue in specific areas. It is true that there are too many high school social studies teachers, for example, for the jobs available but to apply this generally to many fields in special education makes the use of these statistics almost a crime. Yet this misuse of statistics has been so widely disseminated through our media that the public and even many members of the government have accepted this misconception without question. Therefore, I would like to especially commend you for including Part (2) relating to the "conducting and publishing the results of specialized analyses" in the proposed Bill.

May I add a comment relative to S. 1539 which would create a new Federal agency for educational statistics. It would seem to me that this is an improper approach to the whole matter. In many ways, the Office of Education is already fulfilling much of the function proposed by S. 1539. It is that Office which, it seems to me, could best coordinate the gathering of information and the analyzing of statistics once gathered. Much of the work of the Office must depend on statistics and the interpretation of those statistics. To place this function in a separate Federal agency would mean a costly duplication of effort and would place it in a vacuum without the connections necessary to assure that the proper statistics are gathered. It is the Office of Education which deals with all levels of education and it is that Office which can best design a good system for collecting, analyzing, and disseminating educational statistics.

NATIONAL SCHOOL BOARDS ASSOCIATION,
Evanston, Ill., June 6, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education and Labor,
Subcommittee on Education,
Rayburn House Office Building,
Washington, D.C.

DEAR MR. CHAIRMAN: Thank you for your letter of May 7 requesting my comments on H.R. 13991. Problems with the National Center for Education Statistics are immense. More than once I have felt the sense of frustration in being unable to obtain educational data from the center. Many times our office could have used economic data related to education similar to that economic data produced by the Bureau of Labor Statistics on labor-related issues. All too often requests for data are met with courtesy, but also with the negative reply—"We don't collect the data that way."

I have been unable to determine whether the problem is with the inability to collect the proper data or whether U.S. Office of Education officials do not know what data to collect. Periodically I have been told by some members of the Office of Education that the National Center for Education Statistics does not have sufficient staff to perform all of the functions properly.

My sense of frustration is that I have no answers or suggested solutions to correct the situation. By the same token it is held that having the center immediately elevated to an independent agency status would correct the current problems in it. In many ways it might tend to exacerbate the current situation. Communications between and among the divisions of the Office of Education are difficult enough, and one can only imagine the additional bureaucratic problems if the Office of Education would have to operate in conjunction with a new agency. It seems unlikely that communications would be enhanced by such a move. Perhaps you have found the best first step in requiring the Secretary of Health, Education and Welfare to conduct a study and report the results of the study back to Congress.

If we can provide any additional assistance on this issue please contact this office.

Sincerely,

AUGUST W. STEINHILBER,
Assistant Executive Director,
Office of Federal Relations.

STATEMENT OF CARTER L. CLEWS, FEDERAL PROGRAM COORDINATOR, THE ECONOMY PUBLISHING CO.

I. INTRODUCTION

Mr. Chairman and members of the General Subcommittee:

As a representative of the educational publishing industry, I thank you for this opportunity to present my views on the present state and future possibilities of educational statistics. In addition, I commend you for your interest and action in an area of concern to all responsible for educating America's children.

In his letter asking my opinion, Chairman Perkins posed three questions I shall attempt to answer:

1) What is your view on the present state of the collection and dissemination of educational statistics?

2) How can this situation be improved?

3) What opinion do you have on the provisions in S1539 creating a new Federal agency for educational statistics?

II. EDUCATIONAL STATISTICS AT PRESENT

A. Collection

In order to gain an adequate perspective on the present state of educational statistics, I visited the office of Education's National Center of Educational Statistics and spoke to Dr. W. Vance Grant, Acting Chief of the Reference Estimates, and Projections Branch. He kindly apprised me of the efforts he and his associates now make and candidly admitted their shortcomings.

Insofar as the materials the Center currently distributes are concerned, they are both extensive and reliable. In the analysis of recent information and in the projection of future trends, the Center has proven itself to be meticulous and worthy of recommendation.

Unfortunately, genuine questions arise as to whether (1) what is there is enough, and (2) what is there is what is needed. In an informal needs assessment with a variety of sources within the educational community, I found strong indications that the answer to both questions is no.

In seeking the advice of educational publishers, elementary and secondary administrators, and members of the college community, I found their unanswered questions about educational statistics far outnumbered those to which they could find an adequate reply. Admittedly, partial blame for such an unfortunate situation must be placed upon ignorance of what statistics are available (a problem to be addressed later). But, blame must also be placed upon the questionable utility of those statistics now being collected.

Many to whom I spoke said that from what they had seen, Federal education statistics were too general to meet their specific needs. For instance, Anne Arundel Community College has little need for statistics relating to the dropout rate in Iowa. The Federal-State liaion in Meriden, Connecticut, likewise, has little use for spending projections of nonpublic schools nationwide. This is not to say such statistics are not vital or worthy of collection. Rather, it is to say such general information should be part, but not all, of the total information available.

In this connection, I would strongly urge that before any action is taken to expand the activities of the present National Center for Education Statistics, an extensive evaluation be made of the uses of the information currently provided.

It may well be that much of the current collection is not what is actually needed, and, therefore, is not effectively used. If such is the case, we may find ourselves with a voluminous collection of educational statistics that are truly "full of sound and fury, signifying nothing".

B. Dissemination

Conversely, in the area of dissemination, perhaps the work now being done is not "full of sound and fury", but rather of whimper and wane. In what may be termed the college thesis syndrome, most Federal statistics seem to be written by the few and read by the very few. In short, the total message is not reaching the intended receivers.

The reason for such a dissemination problem is two-fold. The first problematic area is saturation; i.e., Is the available information reaching all who need it? The second area involves interpretation: Can those who do receive present Federal education statistics understand what is being said. Again, as in the discussion of collection problems, the answer seems to be no.

As regards saturation, those with whom I spoke in both the private and public sectors of the education community indicated a lack of knowledge as to what statistics the Federal Government offers. Most often, the response to the question, "What use do you make of Federal education statistics?" was an uneasy silence followed by a shrug and an admission of uncertainty about what was available.

In other words, those who need the information most, those who by all rights should have ready access to educational statistics, exist in a gray twilight of intolerable ignorance. While some of the information they need to effectively plan and execute their daily activities may well be in Washington, they sit in the unenviable position of knowing not even what they know not.

As a result, most public institutions and private agencies I interviewed have set up their own in-house survey apparatus. Because of the inadequacy of funds, facilities, and personnel, such apparatus is often limited at best and misleading at worst.

To those few who know enough to turn to the Federal Government, the response is often slow or inadequate. In spite of the extensive and congenial efforts of Dr. Grant and his staff (all of whom man the Center's phones themselves), the present apparatus is simply inadequate to disseminate information on the scale commensurate with the saturation needs of the entire educational community.

The second problem surrounding the present dissemination set-up relates to interpretation. Few among us are adept at ingesting page upon page of columnar numbers and then arriving at concrete conclusions. The very prospect of such an undertaking often triggers a pain avoidance reaction which results in relegating statistical output to dank, dusty corners of university libraries or other such places of equal obscurity.

When limited saturation is achieved, then, and statistics do reach the populace, the populace does not reach for the statistics. Most with whom I have spoken feel they have neither the time nor the expertise to interpret what the Federal Government now disseminates.

And the point is well-taken. As the renowned expert on saying it simply, Rudolf Flesch, observes: tables, graphs, and diagrams do not speak for themselves. Without interpretation in simple, layman's language, statistical output merely adds another dimension of confusion to already enigmatic areas. One need only glance through the materials currently disseminated by OE's National Center of Educational Statistics to realize the Center is guilty of inadequate interpretation.

In this same context, I found many educators complain that Government statistics contradict each other. Possibly so; but, probably not. Those who have dealt in statistical analysis know what usually happens in a case of apparent contradiction is simply inadequate interpretation. If those in charge of Federal statistics would devote more effort to explanations of sample size, sample description, levels of significance, and outcome interpretation; much apparent contradiction would be resolved.

To state the current collection and dissemination problems aphoristically, I would say: What is collected is too little and what is disseminated is even less.

III. SUGGESTIONS

A. Needs Assessment

As indicated previously, before any massive rearrangement of the present educational statistics apparatus is undertaken, a comprehensive needs assessment seems in order. Accordingly, I would suggest surveying the entire educational community by means of random sampling.

Once this study is completed and evaluated, the Government can proceed to establish an expanded statistical service. Such a service would be worthy of confidence in both its utility and its direction.

B. Computerization

Obviously a center able to meet the needs described in H.R. 13991 or in S. 1539 would, of necessity, be computerized. Such computerization would serve the dual purpose of expediency and efficiency.

C. Availability Listing

To partially meet the now neglected needs of dissemination, any new educational statistics apparatus may wish to publish a monthly index of what is available and what is planned. The index should be sent to both the private and public organizations agencies comprising the educational community.

D. Educational Statistics Centers

Finally, I would strongly urge the General Subcommittee to consider establishing a vast network of Educational Statistic Centers throughout the Nation.

The Edstat Centers would be responsible for meeting the local statistical needs in the regions in which they would be located. Such centers would answer current complaints of Federal education statistics being too general.

Should the cost of such extensive dissemination be considered prohibitive (though the cost of wide-spread knowledge would seem a pittance in relation to the cost of widespread ignorance), a number of toll-free WATs lines into Washington would seem an acceptable alternative. If such a set-up were well-publicized and well-advertised, it would undoubtedly serve as an adequate stop-gap solution to the dissemination problem.

IV. S. 1539

As to the provisions in S1539 creating a new Federal agency for educational statistics, I support both the intent of the legislation and the measures outlined.

I would, however, hope for two occurrences. First, I would like to see implementation of H.R. 13991 previous to the implementation of the S. 1539 provisions. Secondly, I would like to see some of the suggestions contained in this paper incorporated into any law restructuring the National Center of Educational Statistics.

V. CONCLUSION

In conclusion, I once again thank you for allowing me to express my views, and I commend you for your concern. Should I be able to assist you in the implementation of your plans, or in any other area where a spokesman for the private educational industry is needed, please call upon me.

NATIONAL ASSOCIATION OF STATE UNIVERSITIES AND LAND-GRANT COLLEGES,
Washington, D.C., June 7, 1974.

Hon. CARL D. PERKINS, M.C.,
Chairman, Committee on Education and Labor, General Subcommittee on Education, U. S. House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR CHAIRMAN PERKINS: We appreciate the opportunity afforded us to comment upon the current state of collecting and disseminating educational statistics in the United States and to discuss our views of problems within that proces which may be alleviated by the proposals in H.R. 13991 and S. 1539.

The state of the art of education statistics collection and dissemination may be evaluated by comparing the seven activities listed in H.R. 13991 (which comprise a kind of ideal work product for federal educational statistics responsibilities) with the actual activities of the Office of Education. In general, based on comments from our member institutions, we think it fair to say that the seven activities either are not carried out by the OE or are done ineffectively. These comments regarding the OE's statistical operations include the following:

(1) Reports on statistical surveys are almost always late. Lacking timeliness, the reports most often are useless when finally received. There appears to be an antipathy toward publishing "raw data," but the quality of the finished products does not justify the additional time taken to produce them.

(2) It is doubtful that what is produced is very_useful except for various forms of esoteric research. It appears that there is no close relationship between current problems facing officials at the OE responsible for policy-making and the data produced by the statistical arm of the Office.

(3) There appears to be no effective link between the Office of Education and other education statistics-gathering units in the Federal Government. Different data bases are used in the different agencies. This lack of coordination results in incompatability of data, so that OE figures cannot be used to check against other statistical reports. Such unnecessary problems exist as having identification numbers assigned to higher education institutions by the Office of Education unrelated to those used by the Veterans Administration, notwithstanding many areas of common interest.

(4) Given the increased concern about the whole range of postsecondary education there seem to be vast gaps in information in the area of vocational and proprietary schools. At this late date there still seems to be no official count of proprietary schools in the country.

In fairness to the OE's statistical unit, it should be pointed out that the program has been too long understaffed. We understand there are numerous vacancies that have not been filled for a long time. Without wishing to denigrate the quality and dedication of the statistical unit's work force, people commenting about their relations with the OE have the impression that in the statistical unit there is a lack of the kind of expertise required to execute assigned responsibilities. We have heard it contended that there is a top-heavy grade structure in the unit, with many assistants to the director responsible for overly broad areas and that morale generally is low. If this is so, it is not surprising that in the process of collecting data the staff has failed to adequately define subjects. This has led different prople using institutional files to think differently from officials at the OE requesting information. Comparisons between HEGIS reports and files of the instititutions reporting apparently show major discrepancies. There appears to be no intent by institutions to be unresponsive; rather there is a failure on the part of the OE to communicate precisely what it wishes to know.

In summary, the concerns reflected by the recommendation of the Senate in S. 1539 and your own introduction of H.R. 13991 seem fully borne out by the experience of the users of federal education statistics.

Strong measures must be taken at once to remedy the situation. For some period now Members of Congress and executives in Federal agencies, as well as administrators of institutions of higher education involved in policy formation, have pointed to the impossibility of making determinations based on guess work in statistical areas for which hard and reliable data should be available. The Senate's proposal to create an entirely separate center for education statistics, reporting to the Assistant Secretary for Education, may be based on the belief that trying to remedy the situation within the present organizational structure in the OE would be merely tinkering with a hopeless situation. Proponents of the independent NCES no doubt feel that creating a wholly new organization would free the presidentially-appointed director to select his or her own high-quality staff, to establish new guidelines and to carry out the mission which is outlined in your bill .There are several examples within the Federal Government which support the notion that an independent statistics-gathering unit working closely with the office making policy does produce the information needed. It is also true that, as a semi-independent agency, the Senate version of NCES would have the necessary visibility that could result in more positive budgetary treatment by the Administration and the appropriation committees of the Congress. Lost in the vast bureaucracy of HEW and the Office of Education, the current statistical unit barely gets a proper hearing. This is evidenced by the comparatively minimal funding provided for its projects and its experience of staff problems. Thus, today it is hampered by its unique problems as well as those of its encompassing organization, the Office of Education.

While the above makes for strong support of the Senate idea, recent history suggests that there are caveats to heed in the Senate proposal. The National Institute of Education is the clearest example. If a statistics agency were established which carried with it the same personnel that now seem to find it difficult to carry out responsibilities, if the budget for the new agency were no better than the current OE unit's, if high level leadership were not found to persuade the Congress to provide necessary support, if clear guidelines for operating immediately toward the goals intended by its establishment were not established, we would simply have a bureaucratic exchange with no effective result. We would have the same unacceptable situation in educational statistics but at a higher cost.

It would be an error to establish a separate Center on Education Statistics until such time as it was absolutely clear what the unit was expected to do to meet the needs of the Congress, Federal Government officials in the agencies, and the educational community. H.R. 13991 moves partly in that direction. The study called for in the bill may be too general to assure the necessary results. If past history is a guide, HEW might have the study performed by the current statistics unit itself. Possibly more effective would be a study conducted by representatives of federal agency statistics units with proven records of accomplishment, who could evaluate the substance and form of the current education statistics operation in the Office of Education and make recommendations based on their own sound experience. Further, there should be assurance that the study would be a major concern of the top leadership of HEW who should be required to give the necessary assurances that the agency is prepared to support educational statistics operations with adequate funding and staffing.

Recent administrative history in the OE indicates that despite efforts by dedicated officials, policy indecision or deliberate procrastination for sundry reasons—including the all-important desire to keep down spending—have rendered programs ineffective. This includes programs ostensibly the favorites of the current Administration. One salient instance is the first year's administration of the Basic Education Opportunity Grant Program. For that reason we would be inclined ultimately to favor the Senate notion of a separate agency. However, to establish such an agency without first conducting the study proposed by H.R. 13991 would invite the dangers of ineffectiveness discussed above. It may be worth the Committee's consideration in the conference to develop a compromise between the two proposals. In effect, legislation enacted by the Congress this year would call for the immediate commencement of an intensive study. The results of the study would form the basis for the establishment, perhaps in fiscal 1976, of the new education statistical center.

I hope the above observations prove of some value to the members of your Committee. Once again, we are grateful for the opportunity to make our views known to you.

Sincerely yours,

RALPH K. HUITT,
Executive Director.

MARYLAND STATE DEPARTMENT OF EDUCATION,
Baltimore, Md., June 4, 1974.

HON. CARL D. PERKINS,
Chairman, House of Representatives, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR CHAIRMAN PERKINS: As a follow-up to our correspondence dated May 24, 1974, we are enclosing a statement on the present state of affairs with regard to educational statistics and the federal role, S. 1539 and H.B. 13991.

Please let us know if you have any additional questions.

Sincerely yours,

JAMES A. SENSENBAUGH,
State Superintendent of Schools.

STATEMENT ON THE PRESENT STATE OF AFFAIRS WITH REGARD TO EDUCATIONAL STATISTICS AND THE FEDERAL ROLE, S. 1539, AND H.R. 13991

In general, it appears from our vantage point in Maryland, and from our contacts with other state education agencies and educational institutions, that improvement in practice in the field of educational statistics lags dramatically behind technological capability. This condition is largely due to the limited financial support for statistical services provided at the state and local levels in the competition for scarce funds. Aggravating the problem are the effects of multiagency data requirements imposed at the federal level. Some of the major problems regarding federal data collection from educational agencies and institutions seem to stem from incorrect understandings or assumptions of persons or groups initiating such collection. Some of these are listed below with comments.

Assumptions	*Comments*
It is always *possible* to obtain information through a mandate having some appropriate legal backing which requires arbitrarily chosen data items with arbitrarily assigned and often unclear definitions in an arbitrary time frame.	Since this assumption is too often incorrect, what is obtained is *necessarily* data of little value.
Systems and/or resources exist at the data source to answer any inquiry that any federal agency may wish to make of any educational agency.	The resources—data, banks, data processing systems, staff time, budget, student time—often *do not* exist to cope with the burden imposed by uncoordinated, unrestricted federal data collection.
The federal government has the authority to mandate the building of data systems for educational information.	Since federal collectors of educational data are unaware of the problems they create, they are also unaware of the interference of these problems with the normal processes and governance of education, the authority for which rests with state governments. Failure to gain state inputs in planning stages and to coordinate with all states in all phases of data collection are evidences of the existence of this incorrect assumption. The "big stick" of federal funding is not sufficient, since states opting not to receive federal funds can spoil any statistics which are national in scope. States are more and more discouraging their local school systems from responding to data collection requests which have not been cleared at the state level.
Since technology is so advanced, the allocation of a few million dollars should be adequate to design and implement a comprehensive educational information system at the federal level.	Aside from the political problems in the above assumption, provision must be made for systems work and hardware/software purchase or rental for, perhaps, 30,000 educational agencies for public and nonpublic elementary, secondary, and post-secondary education on the local, regional, and state levels. With present budget constraints, the money for such overhead type expense will not be forthcoming from the local nor state governments, nor from private institutions. An average of just $50,000 expenditure per agency would present a cost of 1½ billion dollars over and above the cost at the federal level.

It seems to us that the situation can be improved by considering the following points:

1. Federal data collection from any educational agency under the authority of state government should by law be planned in advance with, and coordinated through, a central federal agency.
2. This advance planning and collection coordination should involve representatives of all the states and should incorporate two-way communication of plans with the states.
3. It must be recognized that individual states will always have the option of nonparticipation, no matter what penalties are involved.
4. Any information system building project must consider the costs and resources involved at the state and local levels.

Our opinion about S. 1539 is stated below in general terms:

1. An agency already exists for educational statistics: USOE-National Center for Educational Statistics (NCES). Utilizing NCES as a foundation will

avoid a long period of confusion and ineffectiveness resulting from the creation of a totally new agency. At the minimum, NCES should be given a new legal status for coordinating all educational data collection.

2. Perhaps an independent, new data collection agency would be preferable for NIE, but the new agency would probably just add another competitor to NIE and USOE in federal educational interests.

3. What *must be avoided*, if a new agency is created, is allowing both NIE and USOE to retain some data collection functions in addition to those of the new agency. S. 1539 does not appear to avoid this danger.

Comments on the provisions of H.R. 13991 follow:

1. The idea of assembling *complete* information for any inquiry is a concept long since found impractical in the information systems world. Uses and needs for information have to be identified in advance. The concept that a complete data bank can answer any inquiry also violates a confidentiality principle that personal data collected for one purpose should not be made available for unrestricted use. Although the federal level may only deal in summary data, this principle is likely to be violated at some level of the collection.

2. The *prime* concern for the federal collection of educational data should be the positive and documented need of the data for the management and evaluation of federal programs. Information cannot be complete if some states are willing to sacrifice federal dollars, so the *cooperative* approach to federal data collection is extremely important. Publication and dissemination of educational information is a secondary, although important, function of federal data collection in education. Often cooperation of states is won because of the promise of the utility of forthcoming analyses and publication, but the data too often are not forthcoming, nor timely, nor useful.

3. Hopefully, this provision implies that financial assistance may be made available to the states and local education agencies. Although this approach may be time-consuming, as well as costly, good information in quantity will be available to the federal government only, in our opinion, through this route.

4. Cooperative effort is most important, but it should not attempt to establish new programs, channels, and contacts when a foundation has already been built. The foundation is the cooperative planning and communication that exists between USOE/NCES and the CCSSO's Committee on Evaluation and Information Systems.

5. Yes! See previous remarks. The coordination must be mandated and managed.

6. This provision states an ideal which always is constrained in reality by staff, time, and budget limitations. The catchword here is "direct." "Greater" would be a better term.

7. It seems to us that this provision concerns only one small area of non-statistical educational information involving literature searches, survyes, research activities, summarizing, reporting, and abstracting—services very useful to the various educational publics. These steps are the proper concern of NIE. The design of a *comprehensive* dissemination system for this kind of information is even more impractical than such an expectation for statistical information. Such a system should be approached *separately* for targeted areas of information, according to the financial priorities assigned to the work of NIE.

Dissemination is an entirely different concern, involving different expertise, than collection, storage, and retrieval of statistical-type data. To try to merge the two might require the remerging of NIE functions with those of USOE. It would be better for NIE to learn the lesson for the necessity of cooperative planning with the states through CCSSO and to get appropriate financial backing to develop a good dissemination network system, apart from the collection system heretofore referenced by these comments.

OKLAHOMA STATE DEPARTMENT OF EDUCATION POSITION PAPER, RELATED TO STATUS OF EDUCATIONAL DATA COLLECTION

(Prepared by Amos Kimberling, Director, Information Services)

It is my considered opinion that H.R. 13991 is long overdue. The National Center for Educational Statistics (NCES) of the Office of Education has become increasingly less responsive to the needs of the Education Community in the past few years. As one of those who was interested and involved in the original creation of NCES and the formation of its mandate, it is my perception that NCES has become more concerned with the development of esoteric statistical studies, long-range plans to increase its budget and staff allotments, and increased domination over State statistical programs than it is with its clearly defined mission to provide timely descriptive statistics on the status of American education.

The Congress had in mind a very specific and precise mission for NCES when it was established in 1965. The concerns of the 90th Congress were expresented in a report prepared by a special subcommittee chaired by Mrs. Green under authority of House Resolution 614. The subcommittee's report in House Document No. 193 addressed itself in some detail to its findings of a number of inadequacies which then existed in NCES. Selected marked excerpts from the subcommittee report are attached. It appears to me that NCES has since largely ignored the observations and comments contained in the subcommittee report.

The Congress ought now to ask whether or not NCES has performed its mission, or at least whether or not it has devoted its best efforts to the achievement of that Congressionally-mandated mission. The Congress might also ask whether NCES has rationalized a set of priorities as the basis for diverting resources and attention to projects which are of little interest to the educational community and fail to satisfy the needs of the Congress. As an educator in the field, I must state that I have not been well-served by NCES. Many of my colleagues share this assessment.

When the NCES performance record is being examined and suspected of being found wanting, the easy response is to declare that it can hardly be expected to satisfy all of the requirements laid upon it without sufficient resources to carry out its responsibilities. Any responsible critic must admit that resource availability must be commensurate with mission. Commissioner Ottina says in his prepared statement submitted to the General Subcommittee on Education on May 7, that " . . . NCES has sufftred from a lack of funds and staff commensurate with its mission; . . ." But then, Dr. Ottina proceeds to describe "some of the more than 25 new products and services that NCES has initiated." Why, one must ask, has NCES initiated new products and services when it admittedly lacks sufficient funds and staff to carry out its mission?

The casual observer might easily yield to the indisputable logic of their line of reasoning and conclude that the obvious solution is to increase the resources to a level that will permit the requirements to be successfully met. However, as I view NCES from the perspective of a state education agency producer of educational data and a user of NCES compilations of education data, the problem is much more complex. In general, States have determined that NCES lacks a realistic view of either our capability of data production or of our need for statistical reports.

Shortly after NCES was created, the Council of Chief State School Officers (CCSSO) created a standing committee called the Committee on Educational Data Systems (CEDS). This committee was charged to provide assistance and technical competence to NCES in the development and management of its statistical surveys, to advise NCES of its views on the feasibility of NCES project proposals, and to inform CCSSO of its findings and recommend action for the Council to take. I was privileged to be a State Representative to CEDS from its inception and have served as [illegible] chairman. A period of mutual respect and cooperation ensued. As CEDS bega[illegible] find that NCES chose to seek its council with less frequency and ignore its recommendation with increasing frequency, an atmosphere of frustration and distrust began to develop.

As this situation began to worsen, the Belmont Project was undertaken by the Bureau of Elementary and Secondary Education (BESE), outside the purview of NCES. CEDS was initially specifically excluded from participation in Belmont. When the extent of the burden to School systems laid down by Belmont in the Consolidated Program Information Report (CPIR), the Elementary School Survey (ESS) and Secondary School Survey (SS), and the other data streams proposed by the Belmont group came to full realization, CEDS became very concerned. It should be noted that as the Belmont Project proceeded, NCES also significantly expanded its survey activity with an ever increasing burden placed upon school systems.

CEDS began to document its technical criticisms of both Belmont and NCES projects. Serious technical defects in both Belmont and NCES instruments were called to the attention of the Commissioner, his deputies, and assistants on numerous occasions, only to be patently ignored. As a result of the ensuing conflicts within the Office of Educaion (OE), the Belmont responsibility was finally transferred from BESE to NCES by the Commissioner. But as the CEDS criticism increased in frequency and severity because of the continued lack of response, the Assistant Commissioner for Educational Statistics and others within OE made it appear to CCSSO that CEDS was acting irresponsibly and that Belmont state representatives were not effectively proceeding with the Belmont Project.

In retrospect we can see that Belmont state representatives were not effectively proceeding with the Belmont project because of a variety of reasons which CEDS has already pointed out: (1) LEA's and States had not had input into its development, (2) appropriate data was not available, (3) the forms were too complicated, invaded privacy, and were illegal in some elements, and (4) the States and LEA's could not financially afford to fill them out. CCSSO was persuaded to dissolve CEDS, since it was not being listened to, anyway, to abolish the States' role in Belmont, since no one liked Belmont, and to form a new standing committee to be called the Committee on Educational Information Systems (CEIS). CEIS was given essentially the same charge that had been given to CEDS. Chiefs were asked to appoint CEIS representatives who would be broadly representative of program management and evaluation, statistics and research, and technical expertise in data collection and processing.

Now, some two years later after the expenditure of millions of manhours of state personnel time and thousands of dollars of travel expense, we find the data reporting burden on school systems continues to increase. Surveys with the same technical defects identified years ago are still laid on us. Our advice continues to be seldom sought and usually ignored by NCES. Worse than this is the fact that the NCES justifications for its new projects have become weaker and weaker and their justifications for suspension of survey activities which many of us in the states felt were useful and successful have become less defensible. Many of us feel that we have been manipulated and used—"had"—by NCES.

Data from the 69–70 CIPR, conducted by BESE, were tabulated, but the report was suddenly withdrawn without explanation. Data from the 70–71 CPIR "are being tabuated" according to NCES, but no indication of when, if indeed ever, these data will be reported. Preliminary tabulations of the 71–72 CPIR have been disseminated by the NCES.

NCES has offered no evidence of validity and reliability of the CPIR data it has collected to date. Is there such evidence? If so, how valid and reliable are these data? I am aware of scores of letters to the Commissioner, NCES, and others in OE which point out the probable lack of validity and reliability to these officials. Yet, the 72–73 CPIR recently entered the field, some ten months after the close of the school year. Few, if any local school systems have maintained any records which would permit reliable reporting on this survey, and since its design departs significantly from its predecessors they would not have collected appropriate data if they had maintained data for the previous system. We have tried unsuccessfully for years to tell NCES that it cannot collect data which does not exist. It can manufacture data for the CPIR, but such data would be of highly questionable value to us with Federal program management responsibilities or to the Congress as it considers substantive amendments to Federal educational assistance programs.

I have estimated that at least a million dollars has been spent by OE on CPIR, plus other millions by respondents. No reports have ever been issued. Will a million dollars worth of benefit to Federal and state program managers and to the Congress result? How much more will be spent before a demonstrated benefit will result?

OE and CEDS have been able to cooperate in some areas. They jointly established the Elementary and Secondary General Information System (ELSEGIS) to collect basic educational data. CEDS members and a number of other state statistical and research personnel have long felt that the ELSEGIS project was realistic and viable as a device to acquire, tabulate, analyze, and report basic educational statistics. States participated actively in its development and have cooperated extensively in an effort to improve timeliness. However, the latest available report on LEA staff data is for Fall 1970 and for finance data, FY '69. Such lag is deplorable. We can only assume that NCES decided that its other projects have higher priority which resulted in inadequate resources being allocated to ELSEGIS. NCES may not realize that it is right now collecting school finance data for FY 73 even though it has not yet published data it has already collected for FY 70, FY 71, and FY 72. We wonder if NCES has any plan to clear this backlog soon. If and when these data are published they will have little value other than historical. The FY 73 data were due on May 15. From experience we sincerely doubt that NCES can process these data and report them before the end of 1974 in time to be of use to anyone. Is this the real role for NCES, to continue to collect data of use to no one except for historical study?

Intense pressure was put upon CEDS by NCES several years ago to endorse and agree to participate in a reliability and validity study of the ELSEGIS FY 70 finance survey. We were told that the study would be done under contract. As yet, we have not heard of the study ever being completed. We continue to wait for the contractor s report to be made available to the educational community. Having been chairman of CEDS when the study was reluctantly endorsed. I suspect that the position of my colleagues and me has been somewhat compromised, since we recommended the study to our chiefs but have seen no results. This sort of situation erodes whatever rapport NCES may have developed with the states and certainly doesn't enhance the reputation of NCES with those of us who have made a serious effort to assist and cooperate with the Center management. It merely reinforces our concerns voiced when NCES announced its intention to extend its capability by contracting much of its work.

Many of my colleagues and I are gravely concerned by the extensive amount of NCES work put out on contract on two accounts. One, few of the contractors sent by NCES into Oklahoma have evidenced any understanding of local school systems. Most have sent personnel who have never even worked in a school system. Most of the time on a site visit is spent explaining to the contractor what a school sysem is and how i operates. For example, I had to explain the difference between current expense and capital outlay to an NCES contractor doing a finance study. Having spent his time this way, the contractor representative finds tha his schedule will not permit him to complete his work and he leaves. Small wonder that NCES sometimes has an unrealistic view of the capabilities of local school systems to respond to its demands for data.

Two, before NCES embarked upon its program of extensive contracting, we were pleased to have our professional colleagues from NCES frequently visit us, discuss our mutual problems, and arrive at solutions. Now we rarely see these former friends. Their job has been usurped by contract to someone who has no feeling of responsibility for solving problems but has only a feeling of responsibility for solving problems but has only a feeling of responsibility for seeing that the money-making contracts keep their company in business. The educational expertise of NCES senior professionals is apparently now being utilized full-time in writing contract specs and monitoring contracts which have most often resulted in inferior products. In recent CEIS subcommittee meetings, all too often a contractor is introduced to us by an NCES staffer who then retires to the corner while the contractor makes a presentation. This is such a waste of qualified, highly paid governmental employees.

The Commissioner makes reference in his statement before the Committee to the Common Core of Data (CCD) program and emphasizes extensive state participation" in its development. NCES has frequently exposed its vague but grand plans for CCD. We are told how good it is going to be. But we do not know what it is going to be, except that it is a well conceived, thoroughly planned initiative to minimize the cost and burden of the data collection quirements which we place on State and local agencies and thereby improve the quality and timeliness of reporting. Except to hear the Commissioner's well phrased statement whenever we inquire of NCES of CCD developments, we have had little, if any direct input to this development. We are told that a contractor has completed an issue analysis and designed the elementary/secondary Federal core data base. We have yet to see it, though. We have had no opportunity to provide input. We understand that a feasibility study will be conducted by still another contractor this summer, and we will have our first chance to see what it looks like and react. What will happen if we establish that this contractor's product is not feasible? Will NCES again consider this unpleasant reality as irresponsible behavior on our part as it has in the past and ignore again our advice and counsel?

Two grave concerns regarding CCD are beginning to surface. First, "common core of data" and Federal core data base" rather obviously imply that each local public school system in the U.S. will be expected to capture, make a record of, tabulate, and report upon any requested combination of data elements prescribed by OE or other Federal agencies. If this "common core" is judged by state and local school systems to be needed by and useful to them, the CCD program will definitely improve quality and timeliness of data reported. If, on the other hand, state and local school systems do not agree that data elements in the Federal core are needed, we may reach an impasse. Will the impasse be resolved by Federal legislation requiring state and local school systems to submit to the demands of Federal agencies? Unless this delicate issue is handled tactfully by NCES and OE, the issue of Federal vs. local control over public education will again be heated up and CCD will vanish in the smoke.

No responsible local or state school official will deny that Federal agencies need data to manage Federal assistance programs. But the perennial dispute revolves about how much of what is really needed by Federal officials, how much will it cost to capture, store, tabulate, and report the data, what benefit will derive to Federal, State, and local officials, and how will the cost be shared. NCES has assured us that the Federal government will bear much of the cost. At several meetings with State personnel, the Assistant Commissioner for Educational Statistics, in all seriousness, stated that she considered a $150,000,000 per year Federal assistance program to be an essential element of CCD and pledged her effort to secure legislation to this end. An assumption was made that ESEA, Title V, could be used to fund the bulk of the program. Perhaps, she had failed to notice that Congress had authorized only half this amount for ESEA, Title V, and has never appropriated more than $35,000,000 for Title V. She also may not realize that CCD is really but one of some twenty highly desirable activities that SEAs can use Title V funds to support.

The Commissioner also referred to the OE Data Acquisition Plan in his May 7 statement as though OE did indeed have a plan. It also included a Data Acqusition Task Force (DATF) to oversee the general operation of the "plan." We wonder if the Commissioner has ever seen the "plan." We have seen no evidence that the DATF has ever met. The "plan" reviewed each year by several CEDS and CEIS committees that I have served on was merely an incomplete inventory of data collection forms intended for use by OE. The Data Acquisition Task Force is considered by many state persons familiar with its operations as merely a depository for OE forms—a front intended to make it appear that OE is engaged in some serious effort to eliminate redundancy and reduce burden on state and local school systems. In my more cynical moments I suspect that when pressed, the Commissioner is "PLEASED TO POINT WITH PRIDE" to his Task Force and his "plan." But workable data collection has to have more than fancy words. It has to have meaning beyond busy work for those on whom it is applied.

The "plan" and the "task force" are further examples which make state and local school system officials suspicious of OE's motives in data collection activities.

Consider that CEDS, and subsequently CEIS, have repeatedly asked NCES to provide some form of data item inventory in a format which permits easy examination for duplication and redundancy. Consider that several states have already successfully used several commercially available computer programs for this purpose with their own data collection forms. Consider that in more than three years, NCES has been unable to do so. Credibility continues to stretch thin. We are the intentions of OE and NCES specifically with regard to actions to reduce burden and eliminate redundancy?

We in the State education agencies who provide much of the data requested by OE ask time after time, why? We are usually told that Congress needs the data, OE policy makers, program planners, and evaluators need the data, the educational community wants the data, ad nauseum. We have furnished data for ESLEGIS, CPIR, ESS, Vocational surveys, library surveys, and hundreds of administrative purposes. But we never get any feedback. Why? We hear that NCES has contracts for CCD development, quality control procedures, reliability and validity studies, longitudinal studies, and new survey development. Has NCES become so obsessed with its self-defined glamorous goals that it no longer is aware of its primary mission—descriptive statistics about the progress and condition of American education?

As one who has been in close association with NCES since its formation in 1965, I must conclude that H.R. 13991 is long overdue. It is unfortunate that none of the scores of letters of inquiry and complaint which have been received in OE and NCES were ever directed to the Committee. Perhaps Congress would have acted sooner. If anything, I would recommend that the language of H.R. 13991 be strengthened. I am sure that the Secretary will be able to conduct the required study and produce the required report. I am even more confident that the Secretary's report will contain glowing assurances to the Congress that the problems have been identified and are being solved. A new era of responsiveness will ensue, and everything will be great soon.

Apparently the Congress has the authority to make special studies such as the one done by Mrs. Green's special Subcommittee under the authority of H.R. 614 of the 90th Congress. Might I suggest to the Committee that it give serious consideration to the possibility of conducting its own study of NCES and the statistical program of the Office of Education. The Secretary might be loathe to admit that the operations within his Department leave something to be desired. A study by the Committee staff would not be so inhibited.

DOCUMENTATION SUMMARY

In summary, from the *House Document #193 Report* by the Sub-Committee chaired by Edith Green, Congresswoman from Oregon:

Page 39:

"In contrast, there is a notable lack of personnel having a background in education in the National Center for Educational Statistics. Here, only 27 percent of the management staff come from areas related to education, and 55 percent of the top management positions are filled by people who have come from other Government agencies, principally from military and defense-related organizations. At this point the subcommittee wishes to emphasize the importance, in fact the necessity, of having a well-balanced staff in the Office. With this in mind, the subcommittee wishes to express concern over the preponderance in some areas of personnel with Department of Defense background."

Page 759:

"As noted earlier, many of the Center's top management personnel have been recently hired from other governmental agencies, especially from the Department of Defense. Its Director and Chief of Planning come from industrial computer and computer service firms. Even the Division of Statistical Analysis, which was directed by a person with considerable public school and higher education experience, has received a new chief from the Department of the Navy.

There is a strong need in the Center for personnel who are generally knowledgeable about the educational community. It is, therefore, recommended that the Center attempt to balance its recruiting efforts by seeking out personnel who have a working knowledge of the educational community and data processing as well."

Page 760:

It seems that the Center has been devoting much of its energies to long-range planning, writing initial programs, and the development of systems such as the Basic Educational Data System, which are some years from being fully operational. . . . data requests are frequently scheduled poorly for the school or academic year and cannot be met on the deadlines set."

Page 760:

The Center has developed virtually no information about the nonpublic sector of education including private, parochial, commercial, and technical schools. Six surveys have been made recently concerning libraries, but they are not yet ready for publication."

Page 761:

"The Center was described by one program man as being "all bedside manner and no medicine."

Page 761:

"In the Bureau of Elementary and Secondary Education, one program manager had to contract with a university for computer services and got extremely poor results."

Page 761:

"The Center contains a great deal of potential, enterprise, dedication, and imagination. However, the Office of Education cannot survive or begin to do its management job without strong computer support. There is no question but that a centralized operation with strong top level support must be maintained to support the needs of the Office. A number of things must be done fairly rapidly in order to assure the provision of this service."

In the view of the committee's findings I would like to emphasize the following:

(1) I believe that the philosophy of NCES must change from a collection-oriented to a product-oriented center.

(2) Many more top management personnel in NCES must be people from the Educational Community. They must be knowledgeable in the area of recognized and utilized systems of school record keeping. Data collection should be dedicated to those data items available and that are of some importance to LEA's, SEA's and USOE, or to Congress.

(3) Needs of these data users should be carefully determined and data collection and processing should be geared to produce reports that meet the established needs of the educational community.

(4) Data collection instruments that place a harsh and unreasonable burden on SEA's and LEA's should be avoided. An example of a harsh and unreasonable burden is the data collection effort commonly called the Belmont reports. I would like to refer you to the PERT and Gant Charts which show that it would cost in excess of $16,040,800 and 238.5 man years of OE resources to produce the Belmont forms. Criticism of the Belmont activities caused Belmont managers to employ a technical committee to review their efforts. I would like to quote from the technical review committee's report as follows:

"Beyond the typical problems of conveying and comprehending the elements of a large comprehensive program, Belmont seems to be imbedded in words, concepts, objectives, implications, and issues that make it very difficult to clearly grasp beginings, means, and ends. First exposure to its fundamental ideas and procedures leaves the listener with impressions of a worthy but mushrooming, all embracing, endless system that has the potential of absorbing everything in its path. It may be suffering from "oversell." However, in order to reduce its overwhelming effect and to control for over expectation in terms of delivery, efforts should be taken now to reduce Belmont to a description of basic essentials in terms of What is it designed to do? Why is is needed? How it works? What are its evident shortcomings and strengths?"

This unusually harsh data burden created an uprising by LEA's and SEA's. An example of the kind of response coming out of the uprising in this quotation from a letter written by Howard B. Casmey, Deputy State Superintendent of the Minnesota Deparment of Education.

"The Department of Education of the State of Minnesota is developing computer processing of the data it needs to effectively manage its operations. In common with most states, Minnesota finds itself annually trying to revise the computer programs it has established to meet its needs in order to fulfill data requests of the United States Office of Education. These revisions are not, in most cases, productive of better insight for education in our state.

The Department of Education of the State of Minnesota will, hereafter, provide only that automated information which it has already collected, and which will prove useful to Minnesota.

The CEDS planning committee has gone on record as stipulating that nine months lead-time must be provided by the National Center of Educational Statistics on all new data requests.

Minnesota will hereafter use its own descriptors and/or USOE Handbook series descriptors.

Automation is an expensive process, both in expenditures of time of the limited professional staff of the Minnesota Department of Education as well as the cost of salaries and travel. Federally financed assistance for these activities is needed."

To emphasize the local educational agencies' concern for inappropriate request for data items, the following is a letter from the Menasha Public Schools, Mensasha, Wisconsin:

"Enclosed is the completed CPIR report for the Menasha Public Schools. I apologize to you for not meeting the due date, but I feel no obligation to the federal agency to whom you report for its late arrival. The completion of this report was an exercise in futility. If the object of the Department of Health, Education, and Welfare is to cause frustration and anger, at the local level, and to cause a misuse of local effort, then this report causes the agency to meet this goal. This form is far too comprehensive, too difficult to understand, has too many cross references, and as a result the information on the report could only at best be an estimate.

Assuming that HEW insists that because it is a large sample a true pattern will develop, then let's see the results and make sure HEW demonstrates for the local agencies how the information can be used to improve instruction for students. How can we utilize our time to best meet this objective when we are constantly requested to use valuable time to complete "garbage" like the enclosed report? It is this type of request that encourages local agencies *not* to participate in federal programs."

Concern at the SEA level, prompted Dr. Leslie Fisher, Oklahoma State Superintendent of Instruction, to state following in a letter to the Commissioner of Education:

"This letter expresses a basic concern which I know you share with ~~me~~. This concern is with the multiplicity of uncoordinated elementary-secondary data gathering efforts of the Office of Education. I am aware of the Congressional mandate requiring such data as is "reasonable and necessary" for the administration of Federally funded programs. It is the opinion of my staff and our local education agency personnel that many of the present Office of Education data gathering efforts do not meet this criteria. The sheer weight of Office of Education data requests taxes our State education agency and local education agency resources to the extent that it smothers our efforts to develop our own evaluative, management, and research systems. . . . We in Oklahoma do not feel we can participate further in Belmont. The Belmont . . . accounting requirements do not conform with the accounting practices of our local education agencies. Thus, a dual system of records is required. Belmont will not have feedback of data of any material value to either local or state education agencies. Belmont has wandered far afield from its original purpose and scope. Many of these data items do not meet accepted data criteria in the areas of validity, reliability, availability, reasonability, etc. There is a serious overlap with requests for data. There has been too little consideration for magnitude of the data reporting burden imposed on local education agencies. . . . Certain longitudinal studies are so structured that they present an elusive "can of worms", the projected results from which the state and local education agencies are expected to accept in blind faith."

Additional concern at the State level is noted by the following letter from Dr. Wilson Riles, California State Superintendent of Schools, to Commissioner Marland:

"The local opposition and resistance to Belmont Project reports to which we referred in March have grown to near rebellion and revolt.

California's local school districts face the worst fiscal crisis in history. Many school districts verge upon bankruptcy. Depleted resources make it imperative that school districts be immediately relieved of all reporting burdens which are not essential.

We support the Belmont goal which intends to reduce the quantity of reports upon federally funded programs. However, it is hard truth that must be acknowledged: The Belmont goal has not been achieved."

When Commissioner of Education Marland became aware of this serious break, he made the following statement at the CCSSO concerning the situation:

"Given this background, with which we are all painfully familiar, I would like to spend the next few moments at the beginning of this conference to acquaint you with the steps we have taken and the plans we have laid to correct the sins of our past and to build a good, sound, useful data-gathering system that will serve properly the interests of all who need information about education, from the Congress through the Office of Education to the State and local education agencies. And do it without collecting an inordinate amount of what someone has properly identified as 'junk', and without placing an excessive burden upon those at the local level who must, in the final analysis, answer the questions we raise."

REVIEW AND RECOMMENDATIONS

Apparently the thick layers of bureaucratic management between the Commissioner and where the data collection efforts are being planned are too thick to be penetrated to generate the kind of information needed for effective program implementation. Many of these old defects are still existent.

One, today there are 265 USOE report forms which are compiled into a listing called an "Annual Data Plan," almost one for every working day in the year.

Two, the CEIS Committee has repeatedly requested nine months lead time to review forms and plans for data gathering. We still experience some 30-day turn-around requests.

Three, at the recent Review Committee meeting, 121 of the 265 report forms were not presented and then only 36 of the 144 which were presented were approved by the Committee, but all 265 will still be used by USOE regardless.

In spite of all the problems that these three serve to illustrate, OE continues to attempt to lay this burden on LEAS.

Regardless of which alternative Congress chooses, the same problems exist. But knowledge of education and consideration of policies and operational restrictions on schools could help to resolve some of the problems and make possible some semblance of a good data system. Some considerations are:

1. Certain data is readily available at specific times of the year at LEA's. This is *basic data* on pupils, staff, facilities, programs and finances.
2. More sophisticated types of data are usually not readily available. A special record keeping system is usually necessary. This requires time, training and resources. This is a very expensive process. It may cost as much as $3.50 per data item per school to gear-up to be able to produce the information desired.
3. Agencies who need this type of data should be prepared to pay for it.
4. A definite need determination should be made to insure the necessary justification for each item to be collected.
5. Knowledgeable management people should be from the Educational Community and have broad School Administration background. They should be very sensitive to LEA resources.
6. Data collection must not be in competition with other educational services for funds. Data collection will usually suffer in this situation.
7. LEAS must receive useful data products if they are to continue to respect the collector's data—mere tabulation of a simple data is not enough. The LEA already has this.
8. Use of contractors should be kept to a minimum. Usually the SEA and LEA personnel spend more time educating the contractor personnel than it would take to do the job.
9. Some data should not be supplied by States. This data falls into the following categories:
   a. Data that would violate acceptable standards of confidentiality.
   b. Data that is not available.
   c. Data that produces an unusually harsh burden on the resources of LEA's.
   d. Data to be obtained by contractor personnel in personal visits to the school sites and in visitation with school staff and students.

If Congress wishes to have access a very sophisticated data system, it should supply the necessary resources to set up and maintain it. This should be in a flat grant. When funds for data are in competition with other educational services the data management will suffer.

This is my opinion of what would be required to carry out this plan:

$500,000 per state per year to insure a modern computerized data center.

$1.50 per pupil for the first year to be shared with state and local educational agencies to create and maintain a data base.

$2.50 per pupil for the second year.

$3.50 per pupil for the third year.

$4.50 per pupil for the fourth year and each year thereafter.

50 States at $500,000	$25, 000, 000
50,000,000 students at $1.50	75, 000, 000
Total	100, 000, 000
50 States at $500,000	25, 000, 000
50,000,000 students at $2.50	125, 000, 000
Total	150, 000, 000
50 States at $500,000	25, 000, 000
50,000,000 students at $3.50	175, 000, 000
Total	200, 000, 000
50 States at $500,000	25, 000, 000
50,000,000 students at $4.50	225, 000, 000
Total	250, 000, 000

COMMITTEE ON EDUCATIONAL DATA SYSTEMS REPORT TO COUNCIL OF CHIEF STATE SCHOOL OFFICERS

Gentlemen, the Committee on Educational Data Systems welcomes the opportunity to brief you on the work of this, your committee, during the past year. For those of you who are unfamiliar with the role of this committee, a look at the functions will help to orient your thinking about the committee:

1. Advise the Chief State School Officers on data problems.
2. To assist in developing an integrated general information system which would serve the needs of the local, state, and U.S. Office of Education Agencies.
3. To coordinate U.S. Office of Education, state and local educational agency data collection functions.

We have attempted regularly to advise the Chief State School Officers on data problems.

In 1965 we developed a U.S. Office of Education CEDS manual. This manual contains the items which CEDS deemed most important in beginning a general information system. Copies of this manual have been furnished to the Office of Education and each state educational agency. To date the system described by the manual has not been adopted to the extent that the committee feels desirable.

In the area of coordination, the committee feels that we have achieved less than in any other area. We have reduced to some degree the proliferation of data collection instruments through consultation with data collection officials on many specific over-lapping and duplicated items.

Historically, the committee has been faced with continuous upheaval within the U.S. Office of Education bureaucratic structure which has resulted in a lack of continuity and coordination of data collection efforts at the working level. We are encouraged by recent statements made by Commissioner Marland concerning change of policy toward data collection. If I may, I would like to refresh your memory on some of these statements:

In Commissioner Marland's address at the Annual Commissioner's Conference for Chief State School Officers, June, 1971, he said:

> ". . . steps we have taken and . . . plans we have laid to correct the sins of our past and to build a good, sound, useful data-gathering system that will serve properly the interests of *all* who need information about education . . . and do it without collecting an inordinate amount of what someone has properly identified as 'junk,' and without placing an excessive burden upon those at the local level who must, in the final analysis, answer the questions we raise."

He further states:

> "I use only a few statistics each year, not a few hundred thousand."

The committee views this as a mandate, which we accept, but feel that it has not filtered down to the level at which it can be made to work. For example, our committee was to be furnished multiple copies of the first 100 report forms for next year. Because of conflict about who was to furnish them and limitation on duplication of forms by various agencies we did not receive the multiple forms in time for the last week in the October review. To do its job properly, this committee must have 60 copies of every report 3 weeks prior to the November CEDS meeting. Whether this is an O.E. responsibility or a CSSO responsibility, if the committee is to function effectively they must be provided the material with which to work. Although we continue to face these recurring problems which have added to the historical difficulties encountered, we are encouraged by Commissioner Marland's attitude and current policy. In response to this attitude, we pledge our continued efforts to do all within our power to solve our mutual problems.

The CEDS Planning Committee feels that the current contract with the National Center for Educational Statistics is too restrictive to permit us to adequately interact with the entire Office of Education. This might be solved by negotiating another contract at a level so that our activities might be U.S. Office of Education office-wide.

Along with the improved communication between CEDS and the U.S. Office of Education there should be a continuing interaction between the CEDS representative and his Chief State School Officer. Such interaction will assure that the state representative will take advantage of the regional meetings which have proved such a valuable resource in sharing data programs and techniques.

COUNCIL OF CHIEF STATE SCHOOL OFFICERS' COMMITTEE ON EDUCATIONAL DATA SYSTEMS

CRITERIA AGAINST WHICH SURVEY DATA ELEMENTS CAN BE JUDGED

1. General justification of use: a. Forecasting; b. Evaluation; c. Regulatory; d. Legislative mandate; e. Program operation.
2. Data elements should be compatible with the U.S.O.E. Handbook series.
3. Data elements should be "reasonably available" to make their collection cost-justifiable.
4. The frequency with which data elements are collected needs to be examined against the use made of the information.
5. Consideration should be given to sampling vis-a-vis collection from the universe.
6. Is the data element duplicative; can it be obtained from another source; has it been collected by this or another agency?
7. Does collection of the information violate existing statutes; does it violate the confidentiality of an individual?

RESOLUTION TO THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS FROM ITS COMMITTEE ON EDUCATIONAL DATA SYSTEMS

Whereas, it is recognized that reliable data is needed to manage the educational enterprise at the local, state and federal level; and

Whereas, this data can best be developed through a joint or cooperative effort between the Office of Education staff and representatives from the states; and

Whereas, the Council of Chief State School Officers has delegated the technical review and the assistance in developing this cooperative plan to its Committee on Educational Data Systems; and

Whereas, these Committee on Educational Data Systems representatives should be involved on a continuing basis with the Planning Task Force to develop a data collection plan; and

Whereas, the Council of Chief State School Officers continues to support the cooperative effort to obtain useful data at the federal and state level; and

Whereas, appropriate lead time and timely response are vital to the success of this cooperative effort; and

Whereas, the Committee on Educational Data Systems is experiencing difficulty in providing its technical assistance in a meaningful way; and

Whereas, the Committee on Educational Data Systems has experienced difficulty in clarifying its relationship to the Office of Education in carrying out its role; and

Whereas, the existing contract between the Office of Education and the Council of Chief State School Officers limits the ability of the Committee on Educational Data Systems to fulfill its responsibilities; Now, therefore, be it

Resolved by the Committee on Educational Data Systems:

Section 1. The Council of Chief State School Officers reaffirms its support of the principle that a plan for data acquisition be developed on a cooperative basis between the Office of Education and the State Education Agencies.

Section 2. The Council of Chief State School *Officers requests that the* Commissioner of Education specify that the point of contact for its Committee on Educational Data Systems be the Task Force on Data Acquisition or any subsequent group which has responsibility for data collection across the Office of Education.

Section 3. The Council of Chief State School Officers requests the Commissioner of Education to provide adequate staff and financing for the development of a plan for data acquisition and supportive activities within the Office of Education.

Section 4. The Council of Chief State School Officers recognizes that in the development of a cooperative plan, additional adequate staff time of the State Education Agencies will need to be made available for such joint effort.

Section 5. The Council of Chief State Officers at their fall meeting consider its Committee on Educational Data System recommendation on the cooperative data plan.

Section 6. The Council of Chief State School Officers recommend that states supply only the data specified in this cooperative plan.

Section 7. The Council of Chief State School Officers request the Commissioner of Education to report quarterly to the Council of Chief State School Officers on the status and progress of this cooperative effort.

Section 8. The Council of Chief State School Officers requests that the Commissioner of Education instruct his Task Force on Planning Acquisition of Information to establish a time line after which no new data items may be considered for collection for that particular year, except as approved by the Commissioner.

Section 9. The Council of Chief State School Officers give serious consideration to the reports and recommendations from the Study Commission (October 1971), and from the Federal/State Task Force on Evaluation (November 5, 1971).

Section 10. The Council of Chief State School Officers reaffirms its position that its Committee on Educational Data Systems will continue to furnish technical staff support to the Coordinating Committee on Information and Evaluation; and provide technical advice to Office of Education management and program officers in the cooperative effort to develop an adequate data system to serve both federal and state information needs.

Section 11. The Council of Chief State School Officers pursues a new or modified contract with the Office of Education to meet responsibilities that have been added as a result of the Office of Education Task Force on Planning Acquisition of Information; and to continue funding other Committee on Educational Data System activities as specified in the present contract.

AMERICAN LIBRARY ASSOCIATION,
Washington, D.C., June 10, 1974.

HON. CARL D. PERKINS,
Chairman, General Subcommittee on Education of the Committee on Education and Labor,
House of Representatives, Rayburn House Office Building,
Washington, D.C.

DEAR MR. PERKINS: In response to your invitation of May 7, we are enclosing herewith, on behalf of the American Library Association, a statement on HR 13991, a bill requiring the Department of Health, Education, and Welfare to conduct a study on the best means to improve the collection and dissemination of educational statistics. We will appreciate your having this statement inserted in the record of hearings on this bill.

Thank you for the opportunity you have extended to us to submit this statement.

Sincerely,

EILEEN D. COOKE,
Director, ALA Washington Office.

Enclosures:

STATEMENT OF EILEEN D. COOKE, ASSOCIATE EXECUTIVE DIRECTOR, AMERICAN LIBRARY ASSOCIATION

The American Library Association is a nonprofit educational organization of over 32,000 librarians, library trustees, educators and other citizens who are committed to the development and further improvement of library and information services as a contribution to the educational, economic, business, scientific, and cultural life of the Nation. Founded in 1876, the Association is the oldest and largest national library association in the world. Its concern spans all types of libraries: state, public, school and academic libraries, research libraries, special libraries serving persons in government, commerce and industry, the arts, the armed services, hospitals and other institutions.

The American Library Association appreciates the opportunity to comment on the bill HR 13991 and various related matters on federal education and library statistics. HR 13991 would require the Department of Health, Education, and Welfare to conduct a study on the best means to improve the collection and dissemination of education statistics and report on that study by July 1, 1975. In this statement we will comment also on a provision of the omnibus education bill (S. 1539) which has just passed the Senate; it would among other things create a new federal agency for education statistics. We will also present our views on the present state of the collection and dissemination of Federal education statistics and make some suggestions for improvement.

ENDORSEMENT OF H.R. 13991

We believe that HR 13991 comes at a most appropriate time for a number of reasons, and we strongly support it.

The activities of the U.S. Office of Education in the field of library statistics are and have long been of great importance in planning and operating libraries in this country. This is true for all the main types of libraries—public libraries, school library/media centers, academic libraries, and special libraries. It also applies to all levels of library planning and evaluation—individual libraries, school systems, state systems, regional systems, and nationwide.

The study proposed by HR 13991, properly guided and with the active cooperation of the users of library and other education statistics, should result in marked improvement over the present situation. The American Library Association has long had a structure of committees on library statistics dealing with various specialized areas—for example, academic library statistics and statistics of library education, plus a statistics coordinating committee consisting of the chairman of each of these specialized committees, and representatives of other library organizations such as the Special Libraries Association. At present there are nine ALA committees with a total of 60 members.

If this bill is enacted, we pledge our active cooperation with the Department of HEW in conducting the study as it relates to library statistics and the relationship of library statistics to other education statistics and statistics produced by other agencies of a general, economic, and social nature. We assume that the study will be adequately financed and conducted by experts other than those who have been operationally responsible for the present program. We are prepared to provide to the Department of HEW a member of the overall advisory committee for the study and members of a specialized subcommittee on library statistics.

LEGISLATION ON STATE AND NATIONAL LIBRARY CONFERENCES

As you know, the House Committee on Education and Labor has recently approved a bill calling for a White House Conference on Library and Information Services in 1977, preceded by state conferences. The Senate has passed a similar bill (S.J.Res. 40) for state conferences and a White House Conference in 1976. If the proposed HEW study of education statistics is completed by July 1, 1975, as called for in HR 13991, the results of that study could form an extremely important part of the discussion of statistics at the state library conferences and at the White House Conference.

STATISTICS PROVISIONS OF S. 1539

With respect to the provisions of S. 1539, calling for the transformation of the present National Center for Educational Statistics in the Office of Education to a separate agency coordinated with the U.S. Office of Education and the National Institute of Education, the concern of the Senate committee as reflected in its report on the bill seems similar to the concern of the sponsors of HR 13991; namely, the need for the improvement of education statistics. Some of the provisions of S. 1539 are appealing, especially the establishment of an advisory committee. However, as a whole, we prefer the approach of HR 13991; that is, doing a careful study of substantive requirements first. Such a study would help to provide a basis for judgments as to whether the organizational changes, including those incorporated in the Senate bill, are desirable or necessary. We are not opposed to the objective of the Senate bill, which is better and more promptly available education and library statistics. Perhaps some combination of the features of the Senate bill with those of HR 13991 would be possible.

STATUS AND PROSPECTS FOR OFFICE OF EDUCATION LIBRARY SURVEYS

Library statistics at the federal level are now at a transitional stage between an earlier program of nationwide library surveys by type of library, and a new federal-state system, the so-called Library General Information Survey (LIBGIS). The earlier system consisted of nationwide (full, not sample) surveys by the Office of Education of the principal types of libraries—public, academic, and school—on a more or less regular schedule, with less frequent surveys for various types of special libraries and for library education and manpower. Appendix A attached, reproduced with permission from the 1974 edition of the *Bowker Annual of Library and Book Trade Information*, is a comprehensive tabulation of library surveys conducted or financed in whole or in part by the Office of Education from 1962 to date. This tabulation does not include any surveys undertaken but not published because the quality of the results was unsatisfactory.

It will be noted that the past schedule was somewhat erratic. It is significant that no survey of school library/media centers has been conducted since 1960. In addition, there have been only three surveys of "special libraries"—which are of a varied nature. They include state and local government libraries and libraries of organizations and of private enterprises; and constitute an important part of the total library resources and services in the United States. The tabular presentation in Appendix A gives both the years surveyed and the date of the published report, some of which were only factual and some of which were also analytical. The publication dates were always later than would be desirable and sometimes so late as to make them of little practical use.

In the 30 years prior to 1965, when the National Center for Educational Statistics was established, library and other educational statistical surveys were conducted by the substantive or program units of the Office of Education. With the establishment of the new federal education and library grant-in-aid programs in the sixties, these operational units were forced to concentrate on the administration of the new programs and the statistical function was split off and centralized in 1965 in a new National Center for Educational Statistics (NCES) in the Office of Education. The National Center soon began to develop a new pattern of collection of nationwide statistics—a federal-state system in which the survey data (forms, questionnaires) were formulated on a uniform national basis, but the collection of the information was based on the cooperation of the state agencies. The state agencies helped both in collection and editing and could integrate the national and state data with their own surveys. They were encouraged to use the results of the federal surveys for their own purposes in the states before nationwide results could be tabulated and published. The first of this new type of federal-state statistical survey was HEGIS (Higher Education General Information Survey) followed by ELSEGIS (Elementary and Secondary General Information Survey).

LIBRARY GENERAL INFORMATION SURVEY (LIBGIS)

Library General Information Survey (LIBGIS) is about to be launched. LIBGIS I survey forms for school library/ media centers and for public libraries are being distributed in 1974, covering the current year, on a scientific sampling basis capable of providing valid national totals, and if the states desire, state totals based on different and larger samples. State education agencies and state library agencies will be cooperating and will encouraged to use the state results for their own purposes. The first LIBGIS survey for academic libraries is scheduled to cover the academic year 1973–74. The LIBGIS system was carefully planned and pre-tested, and we have great hopes for it, especially if it can in the future be conducted on a regular annual basis for the principal types of libraries—public, academic, college, and school—and perhaps special libraries as well. Moreover, various special studies and analyses will be required.

In addition to national library surveys, the library surveys branch of NCES in the past few years has been responsible for a number of important activities, aside from the national surveys. Among these have been:

1. A national conference on library statistics in 1966, the results of which were published in 1970 as *Planning for a Nationwide System of Library Statistics.*
2. Active leadership in standardizing library statistics categories and definitions, both nationally and internationally.
3. Encouraging the development of a handbook of standard definitions and recommended practices for library statistics, privately funded, and published by the American Library Association in 1966; and financing a new library statistics handbook now in preparation by contract with the American library Association.
4. The development of a pioneering study on library manpower (personnel)—requirements and supply—by the U.S. Bureau of Labor Statistics, now in process of publication.

"PUBLICATION" VIA COMPUTER TAPES

The development of computers has changed the whole nature of statistical data collection and even more importantly, of statistical analysis. All major statistical surveys now involve placing the data collected on computer tapes as a step in the process of preparing data for publication. More and more, however, computer tapes thus developed are being made available to users of statistics—frequently in advance of the publication of the printed reports. This enables users to do their own analysis of the data in a multitude of ways far beyond the possibilities of any published report. In addition, the tapes properly planned can be used for analytical purposes to cross-classify and compare library data with other educational data developed by NCES and other social, economic, and cultural data, such as that produced and made available in tape format by the censuses. The Bureau of the Census has taken the lead among federal agencies in recognizing the importance of making computer tapes available to users, starting with the Census of 1970. The Bureau not only makes the tapes available for sale but has established what amounts to a system of depository libraries around the country which provide local access to the tapes. Census has also published a kind of consumer's guide to Census tapes with all the necessary information on what is available on the tapes, the type of equipment on which they can be used, and the program language *(1970 Program User's Guide)*. NCES has only begun to get seriously into publication by computer tape.

SUMMARY AND RECOMMENDATIONS

In summary, it can fairly be said that after a "soft" period of transition in the 1960s, especially with respect to the absence of statistics of school library/

media centers, federal library statistics activities in the Office of Education have steadily improved. However, much remains to be done and as the nature and problems of library services have changed and statistical methods have been affected by technology, new requirements have emerged.

The following are the views of the American Library Association as to the most important matters that require attention in the study called for in HR 13991. Several of these policy recommendations were made as early as 1966 in the national conference on library statistics, the principal recommendations of which are attached as Appendix B, with notations added to show what recommendations have already been implemented.

1. We endorse the LIBGIS federal-state system for national library surveys provided that these surveys are conducted on an annual basis for the principal types of libraries as soon as practical, and that at least occasionally these surveys be extended to other types of libraries, such as statistics for special libraries and statistics of library education. Cost sharing—a federal financial contribution toward the cost of state activities—is essential to the optimum functioning of the LIBGIS system. There is ample precedent for this cost sharing in the ELSEGIS and HEGIS systems.

2. We urge more rapid "publication" of results—both in computer tape form as well as in the traditional printed reports. Adequate funding is required for analysis and publication. It makes no sense to spend hundreds of thousands of dollars in collecting basic data and then scrimping on analysis and distribution of the results.

3. We urge a library statistics advisory committee for the National Center for Educational Statistics, both for the conduct of the study called for in HR 13991 and on a continuing basis. This advisory committee need not be formal, subject to the legal requirements of P.L. 92-463. It could be equally effective on an informal basis, similar to the advisory arrangements already in effect between NCES and the statistics committee of the Council of Chief State School Officers in the elementary and secondary fields. There is a comparable organization of Chief Officers of State Library Agencies (COSLA), of which Mr. Alphonse F. Trezza, Director of the Illinois State Library and chairman of the ALA Statistics Coordinating Committee is the current president.

4. We believe that NCES needs more expert personnel and funds to conduct activities in-house. As Commissioner Ottina and Assistant Commissioner Gilford testified in the hearing before your subcommittee on May 7, the rigid requirements on personnel ceilings in recent years have forced NCES to place excessive reliance on contracting-out for the conduct of library and other education surveys, with the result that in-house staff expertise and an adequate corps of professional personnel have not been built up, and each contractor has to start off anew. This is not to say that everything should be done in-house, because there is a legitimate place for contracting-out for certain special studies, but the emphasis should be the other way, especially for repetitive surveys. This is perhaps the most important area to be explored in the study required by HR 13991.

5. The study of educational statistics called for in HR 13991 should encompass an intensive consideration of computer tape publication, including a review of the Census experience and techniques and their potential application to education and library statistics.

6. In 1965 the Office of Education and the American Library Association cooperated in developing a national inventory of library needs. A new national inventory is urgently required, based on the initial LIBGIS surveys.

7. The first Bureau of Labor Statistics library manpower (personnel) study and projection of demand and supply scheduled for publication later in 1974, should be repeated on a regular schedule, with contributory financing by the Office of Education, perhaps every five years.

8. Close coordination needs to be maintained between the statistical program of NCES and national planning for libraries by the National Commission on Libraries and Information Science and certain library operational functions carried on for the entire library system of the United States by the three national libraries—the Library of Congress, the National Library of Medicine, and the National Library of Agriculture. NCES should be used as the statistical arm of these other national library agencies.

9. Lastly, in the study of education statistics operations, attention should be paid to the projections which NCES makes of student enrollments. In this period of rapid and constantly fluctuating economic and social changes, projections need to be more sophisticated and more frequently made than in the past. Mere statistical projections of past trends are not adequate for the future planning of education programs and their library components.

In conclusion, we very much appreciate this opportunity to present the views of the American Library Association on HR 13991 and related matters.

APPENDIX A.—LIBRARY STATISTICS PUBLICATIONS, 1962–1975

(From the 1974 *Bowker Annual*)

COLLEGE AND UNIVERSITY LIBRARY STATISTICS

1962 Library Statistics of Colleges and Universities, 1961-62: Institutional Data (OE-15023-62). 1963, 172 pp.

1962 Library Statistics of Colleges and Universities, 1961-62: Analytic Report (OE-15031-62). 1964, 70 pp.

1963 Library Statistics of Colleges and Universities, 1962-63: Institutional Data (OE-15023-63). 1964, 120 pp.

1964 Library Statistics of Colleges and Universities, 1963-64: Institutional Data (OE-15023-64). 1965, 162 pp.

* *1964 Library Statistics of Colleges and Universities, 1963-64:* Analytic Report (OE-15031-64). 1968, 48 pp.

* *1966* The American Library Association, with a grant from the Office of Education, published an institutional report, *Library Statistics of Colleges and Universities, 1965-66.*

* *1967 Library Statistics, 1966-67: Preliminary Report on Academic Libraries* (OE-15065). 1967, 38 pp.

* *1967 Library Statistics of Colleges and Universities: Data for Individual Institutions, Fall 1967* (OE-15023-67). 1969, 346 pp.

* *1968 Library Statistics of Colleges and Universities:Data for Individual Institutions, Fall 1968* (OE 15023-68). 1969, 172 pp.

* *1968 Library Statistics of Colleges and Universities: Analytic Report, Fall 1968* (OE-15031-68). 1970, 82 pp.

* *1969 Library Statistics of Colleges and Universities: Data for Individual Institutions, Fall 1969* (OE 15023-69). 1970, 158 pp.

* *1969 Library Statistics of Colleges and Universities: Analytic Report, Fall 1969* (OE-15031-69). 1971, 81 pp.

* *1971 Library Statistics of Colleges and Universities: Institutional Data, Fall 1971:* Part A. Basic Information on Collections, Staff and Expenditures (OE-72-103). 1972, 247 pp.

* *1971 Library Statistics of Colleges and Universities: Institutioned Data, Fall 1971:* Part B. Basic Information on Collections, Staff and Expenditures (OE-72-189). 1972, 196 pp.

* *1971 Library Statistics of Colleges and Universities: Analytic Report* (OE-74-11417). 1973, 70 pp.

* *1973 A Survey of College and University Libraries, Fall 1973* is in process. Publication expected for 1974.

PUBLIC LIBRARY STATISTICS

1962 Statistics of Public Libraries, 1962. Part I Selected Statistics of Public Libraries Serving Populations of 35,000 and Above: Institutional Data (OE-15051). 1965, 47 pp.

1962 The 1962 data for public libraries serving populations of less than 35,000 was published by the University of Illinois Graduate School of Library Science in 1966 under the title *1962 Statistics of Public Libraries Serving Populations of Less Than 35,000.*

* *1965 Statistics of Public Libraries Serving Communities With at Least 25,000 Inhabitants, 1965* (OE-15068). 1968, 65 pp.

* *1968 Statistics of Public Libraries Serving Areas With at Least 25,000 Inhabitants, 1968* (OE-15068-68). 1970, 144 pp.

* *1971* A survey of public libraries serving areas with at least 25,000 inhabitants, fiscal year 1971, is being conducted. Publication expected for 1974.

* *1974* A survey of public libraries, fiscal year 1974, is under consideration.[1]

SCHOOL LIBRARY STATISTICS

* *1974* A survey of public school libraries and media centers, fiscal year 1974, is under consideration.[1]

SPECIAL LIBRARY STATISTICS

1963–64 Special Libraries Serving State Governments, 1963–64. Available as ERIC document ED 013 374 from ERIC Document Reproduction Service, P.O. Drawer 0, Bethesda, Maryland 20014.

* *1965 Survey of Special Libraries Serving the Federal Government (1965)* (OE–15067). 1968, 108 pp.

* *1972* A survey of Federal Libraries 1972, is in process. Publication expected for 1974.

LIBRARY EDUCATION STATISTICS

1964–65 Library Education Directory, 1964–65 (OE–15046). 1965, 32 pp.

1964 "Survey of Library Education Programs, Fall 1964." Mimeographed OE release, issued in December 1965.

1966–68 North American Library Education Directory and Statistics, 1966–68. Survey conducted under Office of Education contract with the University of Wisconsin–Milwaukee and the American Library Association. Chicago: American Library Association, 1968, 106 pp.

1969–71 North American Library Education Directory and Statistics, 1969–71. Survey conducted under Office of Education contract with the University of Wisconsin–Milwaukee and the American Library Association. Chicago: American Library Association, 1972, 87 pp.

1972–73 North American Library Education Directory and Statistics. Funded by OE's Bureau of Libraries and Learning Resources. Survey in process. Publication expected for 1975.

GENERAL STATISTICAL PUBLICATIONS

1966 Library Statistics: A Handbook of Concepts, Definitions, and Terminology. Prepared by the staff of the ALA Statistics Coordinating Project. Chicago: American Library Association, 1966, 160 pp.

* *1966 National Conference on Library Statistics.* Proceedings of a conference cosponsored by the Library Administration Division of the American Library Association and the National Center for Education Statistics of the Office of Education, June 6–8, 1966. Chicago: American Library Association, 1967, 100 pp.

* *1970 Planning for a Nationwide System of Library Statistics* (OE–15070). Report of a project of the Library Administration Division of the American Library Association prepared under contract with the National Center for Educational Statistics of the Office of Education. 1970, 117 pp.

* *1971–72 National Inventory of Library Statistics Practices:* Volume I—Data Collections on the National, State and Local Levels. 1972, 100 pp. Available as ERIC document.

* *1971–72 National Inventory of Library Statistics Practices:* Volume II—Agency Profiles and Individual Site Descriptions. 1972, 468 pp. Available as ERIC document.

* *1972 Study of Library and Information Science Manpower, Supply and Demand.* Conducted by the Bureau of Labor Statistics for OE's NCES and BLLR. Report expected in 1974.

* *1973 LIBGIS Demonstration Project* conducted in 1972–73. Report expected in 1974.

* *1973 LIBGIS* State Participation conducted in 1972–73.

* *1973 Library Statistics Operations Handbook*, a project in preparation by the American Library Association Statistics Project, Robert W. Frase, Director. Publication expected for 1975.

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[1] Now definitely scheduled as part of LIBGIS I.

APPENDIX B

Chapter 1[1]

Summary of major recommendations of the American Library Association.	*Annotations indicating action taken or in process on these 1970 recommendations*
1. Planning for standardized, meaningful, and even minimal library statistics must continue—indefinitely. Other research efforts, especially in the areas of management systems, data bank development, user data, and impact of library services are needed and should be coordinated with these guidelines.	1. Some progress is being made.
2. Efforts to standardize terminology must be continued and intensified. Definitions found in *Library Statistics: A Handbook of Concepts, Definitions, and Terminology* should be reviewed, refined, and expanded. While this is primarily the obligation of the profession at large, the terminology should be promulgated by the U.S. Government and revised as needed. Continued recognition by the United States of American Standards Institute, and its cooperation, will contribute to the widest acceptance of this standardized terminology.	2. In process.
3. The National Center for Educational Statistics (NCES) should be assisted by an advisory committee which represents fairly the numerous governmental, professional, and commercial interests in library statistics. This advisory input into planning and operating a national library statistics system should be augmented and supplemented by the National Commission on Libraries and Information Science and by State advisory committees. The Statistics Coordinating Committee of the American Library Association should continue its strong advisory and promotional roles.	3. Not yet implemented.
4. A program of shared responsibility between NCES and the States in nationwide (as well as State) library statistical coverage is essential and should be highly defined, coordinated, and regularized. NCES will have to take a close look at the library functions at the State level to determine which agencies are responsible for which functions.	4. In process as LIBGIS.
5. Federal financial assistance to the States to enable them to carry out their responsibilities in the foregoing system is mandatory. This assistance should be designed to both stimulate State investment in this area and to be used as a tool for regularization and compliance.	5. Not as yet announced.

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[1] From the report *Planning for a Nationwide System of Library Statistics*, 1970, based on the National Conference on Library Statistics, 1966.

APPENDIX B—Continued

Chapter 1'—Continued

Summary of major recommendations of the American Library Association	*Annotations indicating action taken or in process on these 1970 recommendations*
6. Determination of library universes should take place at the State level according to definitions supplied by NCES.	6. A technical sampling problem.
7. Training programs, with appropriate instructors, manuals, meetings, etc., are essential to the national statistics program, both at the State and local levels for general understanding, accuracy of returns, and compliance.	7. Should form part of the LIBGIS system.
8. State should be encouraged to collect data beyond Federal and national needs and should distribute these data widely. They should serve as true information centers on libraries and library conditions in the respective States.	8. Projected as part of the LIBGIS system.
9. Continued national planning should incorporate appropriate steps toward the formation of a national data bank system for library statistics. Such a system should allow for retrieval of specialized library data at cost.	9. See the recommendation above concerning computers.

NATIONAL UNIVERSITY EXTENSION ASSOCIATION,
Washington, D.C., June 7, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education, Committee on Education and Labor,
House of Representatives, Rayburn House Office Building,
Washington, D.C.

DEAR MR. CHAIRMAN: In reply to your request of May 7 for testimony on H.R. 13991, we are pleased to submit a statement for insertion in the record of the hearings on this bill.

We appreciate very much your invitation to present our views.

Sincerely yours,

ROBERT J. PITCHELL,
Executive Director.

Enclosure:

TESTIMONY OF ROBERT J. PITCHELL, EXECUTIVE DIRECTOR, NATIONAL UNIVERSITY EXTENSION ASSOCIATION

Mr. Chairman and members of the Committee: Allow me to respond directly and succinctly to the questions posed by the chairman regarding the collection and dissemination of educational statistics by the Federal Government.

A. *The present state of the collection and dissemination of educational statistics in the country, especially as regards the Federal role.*

In viewing the present state of educational statistics, a number of deficiencies are readily apparent:

1. Institutional data are largely restricted to accredited institutions, although efforts are now being made to collect data from other educational "producers."

2. Student aid data are both incomplete and closely held "in-house" both by the Office of Education and the Bureau of the Census.

3. Except for data compiled by NSF on some Federal funds received by universities, no Federal agency regularly collates and disseminates detailed information on educational expenditures by different agencies.

4. Some excellent data which would be a real contribution to our knowledge of some aspects of education are disseminated late and in incomplete form due to inadequate funding. I refer specifically to the triennial surveys of adult education in the United States which were conducted by the Bureau of the Census in 1969 and 1972 for the National Center for Educational Statistics. These surveys constitute by far the best array of data ever collected on adult education. The 1969 data are in the final stage of publication in abbreviated form and the 1972 data, although available, are not scheduled for publication at this time because of lack of funds.

5. The most significant deficiency is in the lack of useful concepts in accordance with which data can be compiled and analyzed, i.e., concepts similar to those used in economic data series: gross national product, personal income, cost of living index, etc. Significant progress has been made recently by private groups and the National Commission on the Financing of Postsecondary Education, but much remains to be done.

The current situation may be characterized as one in which the collection of education statistics is inadequately conceptualized, organized, staffed and funded to obtain a sufficiently comprehensive array of data on a timely basis for analytical and policy making purposes.

B. *How can this situation be improved?*

Obviously the situation will not improve until the Congress and the public decide that an adequate array of educational statistics are sufficiently important to provide the human and material resources to do the job right. We have done this with economic and manpower data and can achieve the same objective with educational statistics.

1. Obviously the questions of organization and responsibility are crucially important. The National Center for Educational Statistics is at the heart of any reorganization. Should it be revitalized or replaced? If replaced, should it be a line agency within a current department of the Federal Government? A staff agency? A semi-independent Federal agency? Or a wholly private university or research organization operation?

I favor the revitalization of NCES. It has done a reasonably good job with the resources available to it and its two recent triennial surveys of adult education (unfortunately still unpublished) are precisely the kind of educational statistics we need. The staff grasped the conceptual needs of the situation, the surveys themselves were well designed and carried out under contract by the Bureau of the Census in a highly professional manner, and the data have been collated in categories that are most useful to the student and policy maker. (I have had access to the full range of data from these surveys for the major study we conducted last year on the part-time student for the American Council on Education).

2. The mission of the agency is also of crucial significance. Until recently, data collected have been largely restricted to "enrollments" of regular students in accredited schools. Financial data have been largely inadequate because institutions do not keep adequate or compatible data and the Federal Government itself does not keep tab of how much is spent for a wide variety of educational programs operated by virtually every department of the government. The attached Table 14 details the $1.026 billion expended in FY 1972 just on extension and continuing education programs. In any case, the mission of the collecting agency *must be broadly conceived*. It must go far beyond enrollment data at accredited institutions. The triennial surveys of adult education represent the scope and complexity of the data which can and must be compiled.

C. Opinion of S. 1539.

S. 1539's intent to make NCES an independent line agency under the Assistant Secretary of HEW with an interagency-public board of directors is probably the best of the alternatives available at this time. It represents a substantial upgrading of the present NCES which will be a big plus. I strongly recommend its careful consideration by your committee.

The general mission of the new NCES is adequately covered in Section 401 (b) (1) but the only specific and focused charge NCES receives in Section 406 (f) (2) (a) is far too limited and inadequate. I would be happy to provide more detailed suggestions on the range of specific missions the center should receive if you or your staff wishes to explore the matter further.

With regard to H.R. 13991, I believe that we have had sufficiently long experience with data collection requirements in economic and labor series and the deficiencies of the current educational series to preclude the need for another long study by HEW. Most of the alternatives to S. 1539 do not appear to merit serious consideration at this time.

AMERICAN ASSOCIATION OF UNIVERSITY WOMEN,
Washington, D.C., June 7, 1974.

Hon. CARL D. PERKINS,
Chairman, House Education and Labor Committee, General Subcommittee on Education, Washington, D.C.

DEAR CHAIRMAN PERKINS: Thank you for your recent letter and the enclosed copy of your bill, H.R. 13991, which would require the Department of Health, Education and Welfare to conduct a study on the best means to improve the collection and dissemination of educational statistics. I am pleased that you have requested AAUW's comments on this proposal and have enclosed a statement herewith which I would be happy to have inserted in the hearing record.

I congratulate you on your introduction of this much-needed legislation and hope that it will receive favorable attention by the Full Committee and the House of Representatives.

Best wishes,

Sincerely,

ELLEN M. MCCARTNEY,
Assistant Director of Program—Legislative.

Enclosure:

STATEMENT BY DR. DEBORAH P. WOLFE, CHAIRMAN, ON BEHALF OF THE AMERICAN ASSOCIATION OF UNIVERSITY WOMEN

As an organization of approximately 180,000 college or university educated women, we are always interested in improving our educational system. In order for any system to be improved, there must first be adequate and accurate statistical data about that system from which an evaluation can be made.

At the present time there is no effective means by which educational statistics are being compiled and disseminated in time to be useful. Statistics now take so long to collect and tabulate that the figures are of little value by the time they are released and thus are of little use to educators in planning. A careful study is needed to determine where the breakdown is occurring. H.R. 13991 would be a positive step in this direction.

Two problems which deserve attention by the Secretary of Health, Education and Welfare are: (1) the length of time it takes to get returns from the inquiries sent to educational institutions, and (2) the amount of time it takes a computer to program and process the raw data. In each instance strict enforcement of time limits is necessary.

The American Association of University Women believes that the creation of a new Federal agency for educational statistics is not going to solve the problems that exist. We feel that better use should be made of the National Center for Educational Statistics through modernization of its methods of operation and additional funding to enable it to function more efficiently and effectively. By remaining a part of the Office of Education, NCES can better serve the needs of the Office of Education and organizational and educational administrators in planning educational programs.

NORTHWESTERN UNIVERSITY,
Evanston, Ill., June 10, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education, Committee on Education and Labor, U.S. House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR CHAIRMAN PERKINS: Enclosed is a statement I have prepared for the Subcommittee concerning the improvement of collection and dissemination of educational statistics. I hope that the statement is useful to the Subcommittee. I wish to express to you and the other members my appreciation for this opportunity. I will be happy to respond to questions concerning the statement or to provide additional information.

Sincerely,

ANTHONY M. CRESSWELL,
Assistant Professor of Educational Administration.

Enclosures:

STATEMENT BY ANTHONY M. CRESSWELL, ASSISTANT PROFESSOR OF EDUCATIONAL ADMINISTRATION, SCHOOL OF EDUCATION, NORTHWESTERN UNIVERSITY

Mr. Chairman and members of the subcommittee; As the Congress undertakes a review of the Elementary and Secondary Education Act it is critical that there be a detailed examination of educational statistic gathering and dissemination, especially at the Federal level. It is clear that there are now serious deficiencies in that process. The needs of educational policy makers for timely, valid, and analytical information are not being met. These deficiencies are a serious handicap to the improvement of educational programs. That is the problem to which these remarks are addressed.

I will not undertake in this statement to discuss in detail all of the current flaws in the provision of adequate statistics for policy analysis and research. Much of this detail has been dealt with at some length in Dr. Joel Berke's statement to this Subcommittee and in his and Dr. Robert Goettel's work for the President's Commission on School Finance. Instead attention here will be devoted to some of the major causes of the current state of affairs and some of the actions which show some promise to improve the situation.

My interest in this problem area grows from several related experiences. I served as a Faculty Advisor to the Education Unit of the Office of Management and Budget in 1970 and was involved in budget analysis and efforts to improve the impact of Federal education programs. Subsequent to that work, I was part of the research team which produced the book: *Federal Aid to Education: Who Benefits? Who Governs?*[1] That work is, I believe, known to the Subcommittee and was cited in the report accompanying H.R. 69. That work furthered my appreciation of the poor state of statistics gathering and dissemination, especially at the Federal level. The following year a study I conducted for the Citizens Commission on Maryland Government highlighted the difficulties of analyzing educational finances and school effectiveness at the state and local level. Most recently, while on the Faculty of the School of Urban and Public Affairs at Carnegie-Mellon University, I participated in the development of a Leadership Training Institute for state education agency personnel in connection with the National Center for Educational Statistics and the Common Core of Data for the '70s Project. (CC-70). This work included assisting in the development of the finance module of CCD-70 as well as consultation with state education agencies about statistical problems. As a consequence of these experiences I have developed a deep concern for the subject and value this opportunity to share my thoughts with the Subcommittee.

Role of Information in Policy Analysis

The first and, I would argue, the most important need for educational statistics is in educational policy analysis. The needs for research and public information purposes are not to be neglected, but the policymaking function takes precedence. In policy analysis, information is needed to establish objectives and benchmarks, describe current policies and their impacts, and explore and evaluate alternative courses of action. Moreover information is never complete, reliable, or low in cost. So in terms of policy analysis, the problems of educational statistics can be discussed in the context of these three questions:

1. How do you know what information is needed?
2. How do you obtain the needed information?
3. How do you interpret and make meaningful the information obtained?

The questions are appropriate to any field of public policy, but are particularly interesting when applied to education. So each will be explored in more detail.

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[1] Joel S. Berke and Michael W. Kirst, eds. Lexington, Mass: D.C. Heath, 1972.

A considerable component of the problem of knowing what information is needed grows from the lack of a clear and workable definition of education. The scope of Federal concern is broad and covers much more than the public schools. Education is an important component of labor and health programs as well as the military and a variety of other agencies and program areas. What is often referred to as the Federal role in education is more correctly called the Federal role in public schooling. Yet if educational policy is to be sound, it must encompass a broader range of concerns than just those associated with formal schooling. At the state and local levels of government, the involvement in education is even broader. So the diversity of educational activities is even greater and the problem of a comprehensive and consistant definition of education is even more complex. In short, it is not clear where to look for educational statistics, let alone what statistics to collect. Also, since many Federal agencies besides the Office of Education are responsible for these programs, interagency rivalries and lack of coordination can exacerbate the problem.

Because information is always incomplete and costly, decisions must always be made about what to include and what to eliminate for any particular analytical task. These kinds of decisions require a definition of priorities and objectives as well as definitions of the concept of education. The National Center for Educational Statistics has taken substantial steps in this direction, particularly in the Common Core of Data for the 70's project (CCD-70). In this project, there has been an effort to define the finance statistics area as the place of first priority, and within that area to define basic items, levels of responsibility, and priorities for data collection. Work already completed in this area could serve as a foundation for building a more complete and systematic statistical base.

But this work of the National Center for Educational Statistics (NCES) illustrates another of the vexing problems in defining data needs. Improving the collection and analysis of finance statistics requires work with numerous federal agencies as well as state and local education agencies. The "marble cake" nature of the federal system as described by Bailey and Mosher is nowhere more evident than in the problems of building consensus and coordination among all these levels and components of government.[3] Each of the state education agencies has its own finance data system, built on its own accounting definitions and information needs. The variation among the states is enormous. Unless the Office of Education is to take the role of a coercive enforcer of uniformity among states, the problem of building common definitions and consensus of priorities will remain. And even if a common set of data definitions and priorities were devised tomorrow, the existing variations would remain. The cost involved with getting all state and local education agencies on a uniform finance data base, will be elaborated below.

Assuming a concensus on priorities and needs could be built at the federal, state, and local levels, there is no guarantee that the concensus would persist over time. Public policy concerns and priorities do change. As a result, projects with a long development time may become victims of a shift in public policy before they have been completed. So it is often difficult, if not impossible, to anticipate the problems and policy questions which will arise far into the future. If all the policy problems could be anticipated, then only the data necessary to answer those questions and address those problems would be necessary. That would keep the cost and complexity of a statistics collection and dissemination system under control. When it is not possible to anticipate questions and problems to be addressed, data of the most general kind must be collected. That means the individual data items must be close to the smallest unit possible. In the case of finance statistics, for example, building a general data base appropriate to answer a wide range of unanticipated questions requires data about resource allocations at the classroom or even individual pupil level. The cost and complexity of collecting, maintaining, aggregating, and analyzing data from bases built on such small units becomes practically unmanagable, particularly when we are discussing national level policy analyses. In short, there is a trade-off. The smaller and more basic the unit of analysis, the more general the data base and the less need to anticipate policy problems.

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[3] Steven K. Bailey and Edith Mosher, *ESEA 1965: The Office of Education Administers a Law* Syracuse, N.Y.: Syracuse University Press, 1968.

However this approach is also the most costly and complex. The more public policy problems can be anticipated, the more efficient and simple the statistics process can become. But such a system is always vulnerable to the emergence of unanticipated questions and problems. Finding a workable and middle ground between the extremes is a central problem for national policy analysis.

Collection of Data

When data needs and priorities have been established, there remain the problems of actually obtaining the necessary information. At present, much of the information necessary to address present problems is unavailable. Consequently the necessary policy analysis cannot be or is not done. This section discusses some of the underlying reasons for this lack of information and problems involved in obtaining necessary data.

One of the central problems is simply lack of manpower. Professor Burke's statement documents the small size of the NCES staff compared to other federal statistical agencies. Until this problem is remedied, the other aspects of obtaining necessary data cannot even be addressed.

Lack of staff in NCES is one manifestation of the problem of resource constraints in building educational statistics systems. Two kinds of resources are needed; fiscal and analytical. Collecting, storing, and analyzing, all the data necessary to make informed federal policy decisions is indeed a costly proposition. Estimates for the CCD-70 project in NCES run upwards of $100 million per year as the federal share. To this must be added the substantial expenditures at the state and local level. These costs are, of course, quite large, but they are a small proportion of the $70+ Billion dollar annual expenditures for education in the U.S. Since the existence of a comprehensive, policy-relevant information base for educational policy makers would be of benefit to all levels of government, it is reasonable to expect the costs to be shared. But this cost sharing requires coordination and consensus which is again quite difficult to establish among the hundreds of state and local governments involved.

Along with the cost problems are ones of technical feasibility. It is not clear that even if one had the resources, the state of the art of data collection, storage, and retrieval is up to the task. Pioneering work in developing prototype statistics systems have been done in several states (Texas, New York, Rhode Island, Michigan) under the CCD 70 project. The reports of the work in those states reveal the complexity of the problem and the wide variety of different approaches which can be applied. It also is clear from these reports that some fundamental research in development work is still necessary before the full-fledged information bases can be built.

Another aspect of the technical limitations of our current knowledge has to do with measurement and sampling techniques. There are many aspects of educational activities in the U.S. which are very difficult or impossible to measure with current techniques. The National Assessment of Educational Progress had begun to address many questions of measuring educational output. But the measures and sampling techniques produce only gross estimates of overall national accomplishment. These kinds of results are not appropriate to policy decisions concerning specific programs, school systems, or more detailed educational objectives. There are whole areas of educational activity, particularly in the arts and humanities, where achievement tests simply do not exist. Also, the statistical methods for predicting and projecting trends into the future are also quite limited. Therefore, it is often quite difficult to predict changes in enrollment, fiscal capacity, or teacher supply for many areas of the country. These are just some of the areas where the above mentioned research and development efforts are needed.

Another technical and political problem involves security and confidentiality of information. There are innumerable kinds of information which should be collected for policy analysis purposes, much of which can also be misused. This problem is recognized in Title V, Part A of H.R. 69 (Section 406(c), paragraph C3) dealing with the need for standards of protecting confidentiality of persons and at the same time retaining the accountability of institutions and agencies. In many cases the techniques are not sufficiently developed to assure obtaining this policy objective.

Statistical Interpretation and Analysis

When sufficient information has been collected there remain the problems of interpretation and analysis. They are too many to outline in detail here so only one of central interest will be discussed. That is the problem of analysis for decision-oriented research, as opposed to conclusion-oriented research. Decision-oriented research is just another name for policy analysis. It means simply the kind of research that is necessary to support the formation of effective public policy. Conclusion-oriented research is that work devoted to increasing our store of knowledge in the building of theory, but not necessarily related to any particular public policy problem. The needs of the two are often quite different. Decision-oriented research requires timely data, often depends on rough approximations, and cannot often afford the luxury of replication or verification. The information and analysis needs of both types of research should be met in an information and statistics system. Some means is needed to reconcile the differences and provide information which is useful both to policy analysts and to researchers.

Conclusions

The problem has been discussed in three parts: roughly, (1) what information to get, (2) how to get it, and (3) how to interpret and analyze it. Proposals to improve the situation can be discussed in the same terms. So we turn our attention to the first and most important concern: policy objectives and the purposes of statistical collection and dissemination.

In its current attention to the problems of educational statistics the Congress, and especially the General Education Subcommittee is providing the impetus and evidence of commitment needed for change. The specific objectives for the NCES outlined in H.R. 69 and H.R. 13991 are important steps toward establishing policy objectives and priorities for statistical efforts. These steps are of three kinds: (1) providing the organizational and fiscal resources necessary for conducting the statistical operations, (2) defining specific data needs in connection with existing Federal programs and statutes (e.g., children residing in subsidized housing or whose parents reside or work in military installations, and counts of children in families eligible for AFDC), (3) stating general policy questions which should be addressed by NCES and other agencies in order to provide the data necessary for informed policy making. The first two items, providing resources and defining specific data needs are, of course, necessary to improve statistical operations. But I would respectfully submit that more attention should be addressed to the third kind of effort: framing the basic policy questions which should guide the efforts of statisticians and analysts. In an area as complex as the collection of educational statistics, the agencies need the firm policy direction that the Congress can best provide. Because resources are limited and demands many, the efforts must be directed to a set of high priority concerns. Some of these are discussed in Dr. Berke's statement and I would concur with his recommendations. In addition, I would respectfully suggest that some of the following questions be considered as policy guides for the improvement of statistical analysis related to the Federal role in education:

1. What are the impacts of Federal education programs on:

a. spending and fiscal capacity of state and local education agencies?

b. resource allocation patterns in school systems?

c. educational opportunity and achievement in various student populations (e.g., minority groups)?

2. Where ~~is the~~ school system going?

a. what demographic trends are involved, at the federal, regional, and state level?

b. what changes in the economy and labor market affect the needs of the population for schooling, and in what way?

c. how are changes in attitudes and social structures affecting people's needs and desires for education?

3. What are the fundamental research questions which must be addressed in order that education be improved?

a. with regard to the effects of schooling and determinants of school success.

b. with regard to the relationship of schooling to behavior in adult life.

c. with regard to the effects of social and geographical mobility on the stock of human capital in the United States.

While this list is certainly not complete, it is included to give a flavor of the kinds of fundamental questions which should, I would argue, serve as the guide for policy analysis and statistical efforts at the Federal level.

Along with clear policy direction, the improvement of educational statistics requires the necessary resources and organizational arrangements. The resources and arrangements included in H.R. 69 and H.R. 13991 concerning the NCES and the reorganizations of Federal education agencies are significant moves in the desired direction. I concur in and support these proposals both in spirit and detail. In addition, I would respectfully suggest these additional considerations for the deliberations of the Subcommittee.

1. *Because the problem of improving educational statistics involves all levels of government, the NCES Board proposed in H.R. 69 should involve representation from more than the Federal government and scholarly community.* A number of organizations, both governmental and non-governmental are likely candidates for inclusion; the Advisory Commission on Intergovernmental Relations, Council of Chief State School Officers, Educational Commission of the State are just some of the possibilities.

2. *The new Division of Education in DHEW (proposed in H.R. 69) should have specific provision for a substantial analytical staff to explore alternatives and design analysis.* These functions would be necessary staff support to the Assistant Secretary for Education, as well as the Directors of the USOE, NIE, and NCES. Such a staff could also serve a useful function in coordinating educational statistics operations among Federal agencies.

3. *Training and research in educational policy analysis should be included as an integral component of any improvement strategy.* Those involved in educational statistics gathering and policymaking at all levels of government could often profit from improved skills and knowledge. Some efforts in this direction are underway under the CCD-70 program but more are needed. Many analytical problems cannot be successfully addressed simply because the requisite analytical skills and manpower are not available.

These are exciting times to be involved in the study of educational policy. The concern of the Congress for the improvement of the information base for educational policy formulation and analysis is perhaps the most heartening aspect of all. I am grateful to you, Mr. Chairman, and the members of the Subcommittee for allowing me the opportunity to share my remarks on these important matters. The central point of these remarks is, I believe, a simple one; in an area as complex as anlyzing educational policy and providing the information base for that process, improvement requires firm leadership. That leadership should be composed of both support and direction; direction in the form of policy questions and objectives, support in terms of commitment and resources. The informed involvement of this Subcommittee in a leadership role is a sign that significant progress can and will be made. I hope that this statement is helpful in some small way to that important task.

Association of American Publishers, Inc.,
Washington, D.C., June 5, 1974.

Hon. Carl D. Perkins,
Chairman, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

Dear Mr. Chairman: In an effort to be fully responsive to your letter of May 7, inviting comment from the Association of American Publishers on the general purpose and specific content of H.R. 13991, we have consulted with principal "consumers" of educational statistics in the School and College Publishing Divisions of our Association.

Their comments generally lend support to the view that educational statistics are in need of improved collection, interpretation and coordination; of pruning, and particularly of far more timely dissemination. Thus, although there has not been time for our Association to take an official position on your bill, it would be safe to say that our educational publishing membership would generally support its objectives. Recognizing that the Conference Committee on H.R. 69 is about to commence its deliberations, and that the Senate-passed bill provides for an independent educational statistical agency, we take no position either for or against these organizational provisions; rather we believe that, with sound direction and adequate funding, the gathering and dissemination of educational statistics can be improved under any organizational structure mandated by the Congress.

The Chairman of our School Publishing Division states that "probably the greatest problem with OE statistics has been that they are frequently dated long before they are disseminated." This view is shared by a spokesman for our College Division, who adds that "in a computerized society, this 12 to 20-month gap certainly could be improved upon." The consensus would seem to be that any new legislation should spell out the need for prompt dissemination. (In that connection, the recent announcement by the Office of Education of the experimental EDSTAT I—providing educators with direct, low-cost computerized educational statistics—would seem to represent a step in the right direction.)

We have these additional comments from an elementary-secondary level publisher:

"Certain kinds of statistical information valuable in educational planning seem not to be available from any source. It is not possible, for example, to ascertain on any reliable basis the way in which elementary teachers prioritize instruction in various subjects at each grade level. Knowing whether the per cent of instructional time expanded in reading, for example, varies with performance, grade level, etc. could be exceptionally valuable. In any effort to strengthen statistical services, considerable effort should be expended on searching for more meaningful data and relationships than those historically provided."

"Coordination of statistical data collection for national and state agencies could lead to clarification of categories, sampling, etc., so that interrelationships would emerge more clearly. It may be especially important to relate the findings of the National Assessment of Educational Progress to other OE statistics."

A college-level publisher urged a 50 per cent reduction in the amount of OE statistics and suggested they be labeled in a meaningful way. He explained:

"The material we receive now is very hard to read and understand. I would imagine members of Congress would also agree. Most people are not interested in the compilation of material, but to what trends the statistics point."

Recently we have learned that the American Council on Education has embarked on an ambitious program of statistics collection that involved coordination with other, similarly-engaged higher education groups to avoid duplication. We would suggest that, to the extent this is not already done, the National Center for Educational Statistics similarly coordinate its efforts with those of nongovernmental statistical agencies, in the interest of more timely and better-assimilated information.

Thank you for the opportunity of commenting on this legislation.

Sincerely,

RICHARD P. KLEEMAN,
Administrative Director.

AMERICAN VOCATIONAL ASSOCIATION, INC.,
Washington, D.C., June 10, 1974.

Hon. CARL D. PERKINS,
Rayburn House Office Building,
Washington, D.C.

DEAR CONGRESSMAN PERKINS: This is in response to your letter of May 7 relating to H.R. 13991. I was very pleased that you introduced a bill requiring the Department of Health, Education and Welfare to conduct a study on the best means to improve the collection and dissemination of educational statistics. We concur that uniform, consistent and comprehensive data collection of education statistics does not exist. Currently available data may be two or more years old when finally disseminated and therefore of little use for planning or analyzing program needs. We have found that much of the available data tend to be misleading and inconclusive.

These problems exist in varying degrees with the local school systems, as well as on the state and federal level. While there is an awareness of these deficiencies and a trend toward the development of information systems on the state level, there is little coordination or compatibility between systems. Most distressing has been the lack of direction from the federal level to provide leadership from the U.S. Office of Education and the National Center for Educational Statistics.

Project Baseline, which members of my staff have reviewed with your aides, reports that not a single state currently has a fully automated vocational student data system, although 19 have partially automated systems using individual data on students and programs. Only three states have fully automated follow-up information systems, while only 11 have partially automated systems for follow-up.

We have noted that since January, 1974, five announcements of RFPs have been delivered by the USOE and NCES.* This is an attempt to alleviate the problems discussed above; however, it appears to be a dispointed effort with potential duplication and incompatability with state systems and data users' needs. In lieu of a continued uncoordinated effort to provide appropriate statistical data, it is my opinion that the following steps may be appropriate:

(1) Re-emphasize the historical function bestowed on the USOE to collect statistics and facts that show the conditions and progress of education in the states and territories. This information must be diffused and a legislative mandate would be required to emphasize this role from the USOE. You realize this role would be expensive and require approximately two to three times what is currently spent on statistical gathering.

(2) Action to mandate the types of information necessary is needed in order to provide a radical change in the activities of USOE. Information needed would explain trends in the demand and cost of education. The impact of federal programs would be important and I am sure many more types of information would be needed.

(3) It is my opinion that the creation of an advisory committee for NCES might be an improvement. This committee could assist their efforts and perhaps improve the total educational statistical picture.

(4) Because of the role of local and state education agencies in financing vocational education, we may need to realistically deal with the ability of the USOE to trace state patterns and averages. Large groups and samples may not provide an adequate monitor for educational statistics. In addition, the factors causing variations between states and school districts could be a very important aspect and this has never been adequately treated.

(5) In my opinion the utilization of data currently available is as critical as the acquisition of new data. We know that many state and local governments compile data that could be of assistance to USOE and in addition, we know that the dissemination process for educational statistics is not adequate. A thorough study of reports required of the State Board for Vocational Education with the intention of simplification would be an appropriate step.

Thank you for the opportunity to respond to H.R. 13991. If we can be of further assistance, please feel free to let me know.

Sincerely yours,

LOWELL A. BURKETT.

THE UNIVERSITY OF CHICAGO,
Chicago, Ill., June 7, 1974.

Representative CARL D. PERKINS,
Chairman, House Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR REPRESENTATIVE PERKINS: In my opinion, the present state of the collection and dissemination of educational statistics in the United States is inadequate. Information about the impact and effect of Federal programs is especially deficient. The information which is available is scattered through several publications. Data currently available is of little assistance to policy makers. A similar situation prevails with respect to the availability of data for decisionmaking at the state level and in local education agencies.

I fully support the recommendations of H.R. 13991. A comprehensive data base, maintained regularly in order to permit comparisons over time, and designed to provide the answer to significant questions would constitute a worth while investment in the improvement of educational opportunity and in the more effective utilization of resources.

Yours sincerely,

WILLIAM CLAUDE REAVIS,
Professor of Educational Administration.

ASSOCIATION OF INDEPENDENT COLLEGES AND SCHOOLS,
Washington, D.C., June 5, 1974.

Hon. CARL D. PERKINS, M.C.,
Chairman, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN PERKINS: Thank you for your letter of May 7, 1974 concerning H.R. 13991.

I am very much concerned about the state of the art of the collection of educational data in postsecondary educational institutions.

Although the Census Bureau is attempting to make a survey of postsecondary school enrollment for 1973, its continued reference to people as either being high school or collegiate—without any recognition of any other areas of postsecondary education—is most frustrating.

For example, the *1970 Census of Population*, Report PC(2)–5C, issued by the Bureau of the Census in May 1973, contains in the Introduction on Page VI an acknowledgment of "Vocational Training" in business schools and other areas. Also in Appendix C, Page App–7, school enrollment is treated as not "regular" if it includes specialized vocational trade or business schools. Thus, the vocational training itself may be acknowledged in the tables but nonetheless, people are still categorized solely as having so much high school, or so much college—and nothing else.

I do hope something can be worked out some day so that all areas of postsecondary education can be included in the statistical analyses.

I do not have the expertise to comment on whether or not another federal agency is necessary. Perhaps the Census Bureau might expand its initiatives in this area.

Sincerely,

RICHARD A. FULTON,
Executive Director and General Counsel.

STATE OF MICHIGAN DEPARTMENT OF EDUCATION,
Lansing, Mich., June 3, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education, and Labor, House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR MR. CHAIRMAN: Thank you for your invitation to comment on H.R. 13991. I have been concerned about legislation for this purpose since learning that S-1539 would establish a new National Center for Education Statistics (NCES) as a separate agency.

Following are my answers to the three questions you asked. They represent my personal views although I have discussed this matter with several key people in the Michigan Department of Education and the Office of Education.

(Q–1) What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards the Federal role?

(A–1) Excellent. I think the Office of Education does a superb job of collecting data considering the budgetary and other limitations it operates under.

(Q–2) How can this situation be improved?

(A–2) Congress can build on what OE now does by defining goals and objectives, mandating near-term and long-term results, and funding the agency commensurate with the expectations mandated.

(Q-3) What opinion, if any, do you have on the provisions contained in S-1539 creating a new Federal agency for educational statistics?

(A-3) I oppose S-1539. I would rather see the proposed study called for in H.R. 13991 done before action is taken on this legislation. See comments below.

COMMENTARY

There is a great need for a National Center for Educational Statistics. I believe the Congress, the Office of Education, State and local education agencies, professional organizations, higher education, and hundreds of other organizations and agencies have recently experienced several months of agonizing over the legislative process which has brought us to the brink of enactment of another historical education law. In the process, Congress has requested a funneling of statistical information perhaps never before summoned from the resources at hand.

I recall last September assuring my State Superintendent, Dr. John W. Porter, that we need no more printouts on ESEA, Title I, formulae because we have on hand nearly every conceivable breakout of statistical data which could be applied to the resolution of a Title I formula. In all candor, I was overwhelmed, and I know many of my colleagues were, too, by the inexhaustible flow of information that came from many sources.

In summary, I would urge you to proceed with your request of HEW to report by July 1, 1975, on how to best serve the nation in the collection and dissemination of educational statistics. In the interim, I think we should build upon what we now have in the Office of Education. Funds should be appropriated that would enable OE to establish a statistical standards section that would make continuous ongoing studies to achieve standard precision reporting from the States which, in the final analysis, provide the data that is compiled by OE.

Yours very truly,

FRANK HARTMAN,
Federal Liaison Representative.

STATE OF NEW JERSEY,
DEPARTMENT OF HIGHER EDUCATION,
Trenton, N.J., May 22, 1974.

Hon. CARL D. PERKINS,
Congressman, Congress of the United States, Chairman of the General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN PERKINS: The lack of timely educational statistics has been a problem of continuing concern to the New Jersey Department of Higher Education. Significant changes in population during the past few years, together with various social and economic factors, have had a serious impact on the enrollments and programs in higher education in New Jersey as well as on the rest of the country. To carry out effective statewide educational planning, we need reliable and extensive data at state and national levels.

While the Office of Education annually collects data through the Higher Education General Information Survey (HEGIS), the federal statistics are usually not available until two or more years after they are collected from the Elementary-Secondary General Information System (ELSEGIS). Independent agencies, such as the American Council on Education, have endeavored to provide some national studies to fill this void, but these efforts meet only a fractional part of our needs.

In addition to the extended delays in reporting educational statistics, there are many other problems associated with the present system including:

1. Incomplete or late data, due to failure of schools and colleges to complete HEGIS survey forms. Often the fault lies with institutions which at times lack the ability and willingness to provide the data.

2. Lack of continuity of data elements which limits the development of historical and comparative studies.

3. Elimination of planned surveys, e.g. "The Residence and Migration of College Students" scheduled for 1973, was cancelled. The last survey was done in 1968. This is an important element in our planning efforts.

In view of the present state of national educational statistics, I would wholeheartedly endorse any federal effort to improve the situation.

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I believe there are a number of specific steps that could be taken to make the federal educational data system more effective:

1. Strengthen the authority of the federal agency collecting the data in order to improve compliance by the educational institutions and reliability of their data.

2. Expand the analytical capability of the federal data collection agency. The individual states need comprehensive analyses (e.g. projections, interpretations, etc.) of national statistics to help in planning the development of state educational systems and coordinating these efforts with national programs.

3. Publish preliminary reports of national statistics even if all data are not available. While it is important to assure completeness of published data, extensive delays often occur in trying to obtain 100% response to a survey. Distributing timely reports that may only be 90% complete and 10% based on intelligent estimates, could be more important than delaying a report for several months or years in order to account for every school in the nation.

4. Establish coordinating agencies within each state for collecting and editing and then transmitting state-level data to the federal agency. At this time, only about 1/3 of the states, including New Jersey, have such a coordination effort. Communication from Washington to individual colleges is bound to be a cumbersome process resulting in extensive delays.

5. Assist the states in developing uniform data processing systems to handle the extensive educational data in a rapid and efficient manner.

6. The federal agency should work closely with the state coordinators in the development of HEGIS projects, (e.g. Establishing uniform terminology, identifying appropriate data elements, setting priorities, etc.) This relationship would stimulate state cooperation with national surveys and help assure the collection of data that will be of real value to decision making at both the state and national level.

In reviewing S. 1539, I find that many of the above suggestions are incorporated in the provisions in the section of the bill directed toward improvement of the administration of educational programs (Title V) and should help to correct many of the problems in the present federal educational data collection system.

Although it may not be directly related to educational statistics, I would like to offer a suggestion to obtain information on the potential number of college-bound students. As you know, attending college is a serious financial decision for most Americans. Since post-secondary education is a multi-billion industry in the United States, the educational plans of Americans is of interest to many state and federal agencies (as well as the educational institutions) for planning, funding, and related areas. To obtain this type of information, I would like to suggest that the United States Department of Commerce include a question on the "intent to purchase post-secondary education" in their quarterly survey of consumers (published in Series P. 65 in "Consumer Buying Indicators"). This type of information would be a helpful element in forecasting college enrollments.

I appreciate the opportunity of presenting my comments to you on this subject and endorse your interest and continuing efforts to effect improvements in the federal educational data system.

Inasmuch as I serve as chairman of the Federal Relations Committee of the State Higher Education Officers, I have taken the liberty of suggesting to those state officials that they communicate directly to you their views on the matter of federal data collection.

Sincerely,

RALPH A. DUNGAN, *Chancellor.*

THE NATIONAL CATHOLIC EDUCATIONAL ASSOCIATION,
Washington, D.C., June 6, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education and Labor, General Subcommittee on Education, House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN PERKINS: The National Catholic Educational Association gratefully acknowledges your invitation to react to the General Subcommittee on Education's bill, H.R. 13991, calling for a study to determine the best means for improving and disseminating educational statistics. Since NCES is a professional educational association representing almost 11,000 Catholic elementary, secondary, and higher educational institutions, our primary concern is naturally for the private and nonpublic sector, about 9% of the national student enrollment. The needs and problems related to national educational statistics, however, seem to cross all boundaries and are of common concern.

First of all, we regretfully agree that the collection and dissemination of national educational statistics is presently in a sad state. The best public school data on higher education has long been produced by the American Council on Education; the best public school data on elementary and secondary education has long been produced by the National Education Association; the best nonpublic school data in recent years has been produced by the Association of American Colleges, on the level of higher education, and by NCES, on all levels. It is my understanding that all of us, certainly NCES, have felt the heavy financial burden of these efforts, even to the extent of research cutbacks and de-emphasis.

The federal agency charged with this responsibility, the National Center for Educational Statistics, has simply not done the job. To what extent this is the fault of the Center or the fault of excessive bureaucratic procedures, lack of funds, stymied professional independence, or other factors, must be left to qualified and internal judgment. However, the Center is charged with the responsibility of collecting and disseminating general educational statistics, as well as program statistics, and this data has not been published in recent years with any degree of scope, regularity, and depth. We say this despite the fact that in 1970–71 NCES very successfully gathered Catholic school data on a grant from the Center. This is our view of the present state of data collection and publication.

As to the federal role, we believe that it is the responsibility of the federal government to gather and disseminate such statistical information as to sufficiently inform citizens about the vast and various educational sectors and levels which they support, and also to make such general and programmatic data available as to ensure constructive analysis and the proper use of funds. The federal government may do this directly or indirectly, by the direct efforts of their own bureau personnel or by contracting with qualified private agencies, but the responsibility is clearly a federal one. No other agency can assimilate and coordinate such diverse elements in a nationally critical area.

As to how the situation can be improved we believe that an intensive feasibility study conducted by statistical professionals who must listen to the advice of the national educational associations is the proper place to begin. Therefore, we endorse H.R. 13991. We are assuming, of course, that no one underestimates the complexities, the problems, the cost, and the high degree of statistical competence demanded to resolve such a confused situation. We are also assuming that no one overestimates the minimal contribution of those who would advise very generally in a "blue ribbon" manner or who would overlay their particular preferences upon a complex situation which cannot accommodate them. It is essential that such a feasibility study work very closely with national educational associations to correlate data needs and to coordinate the various statistical efforts being made.

We have deliberately not specified that a new federal agency be created. A new agency insures no solution, unless perhaps this is the only practical way to create a professionally staffed, properly funded agency sufficiently free of stale-mating procedures and regulations to meet their responsibilities. For example, it is my understanding that the Office of Management and Budget has the right to approve or disapprove, even change, an NCES questionnaire. This seems to be an absurd procedure, in which personnel are entangled in an area beyond their competence. Even if this example can be justified, the point is valid. However the agency charged with this statistical responsibility is structured. It has an extremely complex and arduous task which cannot possibly be appreciated by anyone who has never attempted a similar endeavor. Consequently, the need is for professionals of the highest quality, with an adequate supporting staff, funded to the extent consistent with specified objectives, allowed to function in an efficient manner, and with the authority to sub-contract with other professional organizations when it is advantageous to do so. Whether this is best achieved through adjustments in the present structure or by creation of a new agency should be left to the chief H.E.W. administrative officials, who presumably best understand all of the circumstances.

May we once more express our appreciation for this opportunity to comment. Be assured that we are prepared to cooperate in any productive manner.

Rev. **Frank H. Bredeweg**,
Director of Research.

Stanford University,
Stanford, Calif., May 23, 1974.

Hon. Carl D. Perkins,
Chairman, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

Dear Mr. Perkins: I am responding to your May 14 request for my opinion on H.R. 13991, your bill requiring HEW to conduct a study on the best means to improve the collection and dissemination of educational statistics, and your request for comment on S-1539, a proposal to create a new Federal agency for educational statistics.

On the former, H.R. 13991, I have no reservations or suggestions. Indeed, you are to be complimented and thanked for bringing it forward. We do not now, in this country, have useful data on the status and progress of the educational establishment; the task of proposing and criticizing educational policy has been pursued quite blindly, insofar as empirical bases are concerned.

I have very strong reservations about S-1539, which would create a new Federal agency for educational statistics. My reservation may also have implications for H.R. 13991. Namely, it strikes me as both inefficient and possibly dislocating *not* to assign this function to the National Institute of Education, assuming that adequate resources can be made available to the Institute for this purpose.

I trust that the foregoing is responsive. I will be happy to respond to any specific questions you may have.

Sincerely yours,

Arthur Coladarci, *Dean.*

State of California,
Department of Education,
Sacramento, Calif., June 10, 1974.

Hon. Carl D. Perkins,
Member of the U.S. Congress, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

Dear Congressman Perkins: Thank you for the opportunity to submit a statement regarding H.R. 13991 as well as any related matters indicated in your recent letter. State Departments of Education are vitally concerned about the matter of educational statistics. They are in a sense, both producers; that is, agencies which submit data to the Office of Education as well as consumers, those who are recipients of reports and various summaries from the U.S. Office of Education. Because we are closely allied with the work involved, I can share the disappointments and frustrations that you voice in your letter. I feel that H.R. 13991 is a valuable first step in reviewing and clarifying the problem and making provisions for a comprehensive report to Congress on the status of the data collection system. I support the bill completely.

Two sections of the bill are of particular and specific interest to me. Section 3 deals with the problem of assisting State and local educational agencies in improving their statistical and data collection activities. I feel that this has been a vital area long overlooked in previous actions of the Office of Education.

Section 4 highlights another critical area; that is, a cooperative and comprehensive plan for the collection analysis dissemination of necessary data. I have long been concerned that vital public policy decisions are often made, of necessity, on fragmentary and sometimes incomplete information.

I would now like to address myself to the three specific questions that you asked. Specifically, what is my view on the present state of the collection and dissemination of educational statistics in the country, especially as regards the federal role. I think the fairest response I can make to that question is

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that the Office of Education is performing an inadequate role, not necessarily in the collection of data, but in analytic and dissemination functions which turn numbers into information. The amount of raw data transmitted both from local educational agencies and state educational agencies to the federal government staggers the imagination. Only in rare instances do the producers of this raw data receive feedback on the analysis, not only of their particular states, but of the nation's progress, achievements and disappointments in the area of education. This is particularly and unfortunately true in the evaluation of the massively funded educational programs.

Your second question deals with the improvement of the situation. I would like to suggest several avenues which I think might lead to improvement of the situation. First, I feel that there needs to be clarification of the statistical collection responsibility; as an example, the National Center for Educational Statistics collects various statistical data. Evaluation data may be requested from another bureau within the Office of Education. I feel that there is a lack of coordination and internal communication within the Office of Education, leading perhaps to a duplication of effort. Because I have had frequent dealings with the National Center for Educational Statistics, I feel I am both a friend of theirs as well as one of their severist critics. I am aware of the massive job which they have to perform and I am equally aware of the inadequate staffing and financial support, which is afforded them by the top administration of the Office of Education. I would suggest that a scrutiny of the line item resources devoted to the National Center for Educational Statistics, looked in proportion to the total budget of the U.S. Office of Education would be extremely enlightening. Further, a comparison of such support with that of other agencies, such as the Bureau of Labor Statistics and the organization which collects health statistics, I feel would also be enlightening.

The question regarding my opinion of the creation of a federal agency for educational statistics is somewhat more difficult to respond to. My first opinion is that I am generally in support of such an action because I feel that it would give this vital role a visible function; it would provide necessary financial support and free it from the often stultifying effects of the bureaucracy of Health, Education and Welfare.

My enthusiasm, however, is tempered when I look at the National Institute of Education. Many of the problems I have cited come not from within the National Center for Educational Statistics, but from the lack of general support awarded it by the top level administration of the Office of Education and perhaps in the upper echelons of Health, Education and Welfare. Without firm statutory guidance and adequate finanial support the proposed federal agency may not yield the results for which we all have a hope.

As I mentioned previously, we have worked with the National Center and I would not want new legislation to intervene in the continuity of that unit. I would recommend for your consideration that some provision be made. I believe new legislation would recognize this unit and if possible, at least temporarily, continue that leadership and staff. I am concerned that a new unit with different personnel could be created and it would take a considerable length of time before we could establish the understandings and background which now exist.

Thank you again for the opportunity to respond to H.R. 13991 as well as provocative questions posed in your letter.

Very sincerely yours,

ALEXANDER I. LAW,
Chief, Office of Program Evaluation and Research.

STATE OF SOUTH CAROLINA,
DEPARTMENT OF EDUCATION,
Columbia, S.C., May 24, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR SIR: I feel that your introduction of H.R. 13991 is a positive step in the right direction. My responses to the questions in your letter are given below.

At the present time I feel that the whole effort relating to the collection and dissemination of educational statistics at the Federal level has been moving in a positive direction. This is not to say that improvements such as those related in H.R. 13991 are not necessary. It is truly unfortunate that data collection from the many program areas at the Federal level is not centralized in respect to authority and mission. As you know, attempts have been made to coordinate these activities under the National Center for Education Statistics which is handled by Dorothy Gilford. In my opinion, Dorothy's efforts and the potential impact of H.R. 13991 are congruent.

You specifically asked how the situation could be improved. Quite frankly, sir, I can honestly state that I don't know of any better action leading toward improvement of the situation than the bill you have introduced. It must be emphasized, however, that the creation of an agency for this purpose would be very severely diluted if authority were not given to the new agency to accomplish its role.

Although I do not have a copy of S. 1539, I understand that the bill attempts to create a semi-official agency organized in a manner similar to NIE. Although it is difficult to make specific recommendations about S. 1539 since I do not have a copy, I am concerned about the philosophy which underlies the proposed agency. In my opinion, any agency held responsible for statistical data is in essence responsible for an aspect of recorded history . . . a mission which should be clearly set by law.

Sincerely,

W. E. ELLIS,
Director, Office of Research.

NATIONAL ASSOCIATION FOR EQUAL OPPORTUNITY IN HIGHER EDUCATION,
Washington, D.C., June 10, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education, Committee on Education and Labor, House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR MR. PERKINS: In response to your letter of May 7, 1974, I am submitting for the hearing record a statement on your bill HR 13991 and the following additional matters as requested.

1. What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards to the Federal Role ?
2. How can this situation be improved?
3. What opinion, if any, do you have on the provisions contained in S. 1539 creating a new Federal agency for educational statistics?

Thank you for the opportunity to provide you with this statement. If we can be of further help to you, please let us know.

Sincerely,

MILES MARK FISHER, IV,
Executive Secretary.

Enclosure:

STATEMENT BY MILES MARK FISHER, IV, EXECUTIVE SECRETARY, NATIONAL ASSOCIATION FOR EQUAL OPPORTUNITY IN HIGHER EDUCATION

The following statement is in keeping with your request of May 7, 1974, for comments on H.R. 13991 and additional matters.

It is important that a study be conducted on the best means to improve the collection and dissemination of educational statistics. Some of the problems revolve around adequate information and the turn around time on the availability of statistical information on education.

In an era of accountability it is necessary that adequate information be available for evaluating and determining the direction in educational matters. Decisions made on adequate information should be the basis of deliberation made in the best interest of the nation.

The Federal government can do a better job in collecting and disseminating educational statistics.

My response to the three questions that were raised are as follows:

1. What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards to the Federal role?

The Federal government must provide the leadership in providing educational statistics for the country.

Adequate personnel must be provided to insure that the kind of job that is needed can be carried out by those persons responsible for that task.

From the time of the collection, processing, analysis and publication of data, there is in most instances too great a lag in time. Some way has to be devised so that within 30 days, or not later than 60 days, of the close of the fiscal year or deadline there is the capability to pull together certain important statistical data.

Information should be collected to insure the adequate identifiability of the real persons who participate in the educational experience throughout the nation along with the insight that the checks and balances for accurate information are built into the system.

Information from such areas as the Office of Civil Rights would be consistent with the overall educational information because of the care taken to see that it is reported accurately.

2. How can this situation be improved?

The following suggestions might focus on how the situation can be improved, namely:

1. Increasing the emphasis on accurate reporting.
2. Providing the necessary personnel to see that the job is done.
3. Establishing a baseline of educational information for future comparisons.
4. Coordinating of all information at all levels—Federal, State, and Local as well as institutional.
5. Establishing a master survey for all information in order to eliminate duplication.
6. Establishing realistic time frames for reporting.

This list is by no means exhaustive but is indicative of some of the ways this situation might be improved.

3. What opinion, if any, do you have on the provisions contained in S. 1539 creating a new Federal Agency for educational statistics?

The following opinions focus on the provisions contained in S. 1539 creating a new federal Agency for educational statistics:

The concern for postsecondary school systems should be included in the information base for this Agency. The various levels of education must be seen as a whole statistically.

The National Board for Education statistics should be expanded to include Federal Interagency Committee on Education persons from the various departments and agencies that were not included on the list, namely: Department of State, Department of Defense, Veterans Administration, Department of Agriculture, Department of Housing and Urban Development, Department of Interior, Department of Justice, Atomic Energy Commission, and the National Aeronautics and Space Administration. This would allow for the Interagency coordination of all educational statistics.

With the role that the states are to play in this data gathering, they have no input at the level of the National Board for Education Statistics.

Concern is raised over the paying for information requested that through oversight might possibly be in the purview of the Agency's work.

COUNCIL OF CHIEF STATE SCHOOL OFFICERS,
Washington, D.C., May 29, 1974.

Hon. CARL PERKINS,
Chairman, House of Representatives Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN: Thank you for your letter requesting a Council of Chief State School Officers' statement for insertion in the hearing record for HR

13991. I am pleased to have this opportunity to submit testimony on behalf of the Council regarding the future role of the federal government in the area of educational data acquisition.

Our view on the present state of educational data acquisition by the federal government is that, in spite of the efforts of certain USOE personnel, the federal government is doing a poor job of collecting and disseminating educational statistics, and we commend you for introducing legislation to remedy the problems. We believe the federal government should collect and provide back to the state and local agencies educational information that is correct, comprehensive, and current, and that this information should be collected with the least possible burden on state and local education agencies.

In regard to the federal data acquisition role, a major problem results from the horrendous burden federal data requests impose on the local and state agencies. A review of the Consolidated Program Information Report (CPIR) data collection instrument will indicate the extensive number of work hours required on the part of local and state personnel to provide the federal government with its required data on federal programs.

Adding to this burden is the problem of duplicate data requests on the part of two or more federal agencies. It is inexcusable when local and state education agencies are asked to provide the federal government with the same data again and again. It is only fair to say that some of the informed federal agencies have cooperated with the National Center for Educational Statistics (NCES) and the Office of Management and Budget (OMB) in coordinating their data requests. However, certain other uninformed or uncooperative federal agencies have plunged ahead in seeking data relevant to their needs, only to be rebuffed on the basis that the data they seek have already been provided to the federal government. There were glimmers of coordination improvement when forms clearance was solely the responsibility of OMB. However, now that the General Accounting Office has been assigned clearance responsibilities for certain data forms, coordination appears to be threatened.

Another problem in the present state of federal data acquisition is prolonged turnaround time. We have observed state and local agencies are, for the most part, willing to cooperate with the federal government in collecting data. However, when it takes up to three years for the federal government to report back to the states on survey results, the usefulness of the data in terms of making management and planning decisions has long since diminshed to zero, and the states tend to view their gigantic effort in collecting the data as entirely wasted.

Another factor that has impacted on the present state of educational data collection and dissemination has been the fiscal and manpower limitations placed on the National Center for Educational Statistics. The Center's budget has been drastically cut over the past few years and its manpower ranks have been depleted, giving it a very low priority in the overall Office of Education structure.

Let me emphasize that in our view these problems have not resulted due to a lack of effort or cooperation on the part of NCES. Much to the contrary, there has been a strong effort and good cooperation. Had it not been for this, the situation would undoubtedly be much worse. More specifically, through this cooperation state and local agencies have been able to interact with federal staff through the Council's Committee on Evaluation and Information Systems (CEIS) in terms of reviewing and making improvements on proposed federal data collection processes and instruments.

In terms of improving the situation, we believe that HR13991 is a step in the right direction. We believe the report developing out of this bill will indicate that NCES deserves a higher priority within USOE in terms of funding and manpower in order to accomplish more effectively the numerous responsibilities it is assigned. In addition to this, we believe the responsibility for coordination through forms clearance should be placed in a single federal agency. We also believe that Congress should oversee educational data acquisition by holding NCES oversight hearings on a periodic basis. If the kind of report that is proposed in HR13991 were made on a periodic basis, Congress would be kept fully informed about this important governmental activity and be provided a better opportunity to give policy direction to federal data acquisition efforts.

In regard to our views on the S.1539 provision calling for a new federal agency for educational statistics, we have serious concerns. Basically, it seems to us the problems surrounding federal data collection and dissemination are of such a nature that they cannot be resolved by merely changing the location of the

Center. Location is not the real issue. To the contrary, we view the present location of the Center within the Office of Education adjacent to the educational bureaus and the programs on which data are collected as a definite advantage to both the states and the federal government. Your proposal to review and study the problem before taking the relocation action called for in S.1539 is by far a more sound approach to the problem and certainly will not result in an action that may later prove to be a mistake on the part of Congress.

Sincerely,

BYRON W. HANSFORD,
Executive Secretary.

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS,
Washington, D.C., June 5, 1974.

MR. CARL D. PERKINS,
Chairman, Committee on Education and Labor, Congress of the United States, House of Representatives, Rayburn Office Building, Washington, D.C.

DEAR MR. PERKINS: Dr. Sumberg, the Association's Liaison Officer, has provided me with a copy of your bill (H.R. 13991) and has asked me to express an opinion.

I believe the HEGIS questionnaire used by HEW to be an excellent instrument for collecting statistical data. As the director of the AAUP annual survey of faculty compensation (copy of which is enclosed), I am very familiar with the procedures and methods used by HEW as well as NEA and other agencies conducting similar surveys. I have participated in the revision of the HEW questionnaire (i.e., the sections pertaining to faculty) and work with members of the HEW Research Division responsible for this operation. The only criticism I would make concerns the release and availability of the data collected by HEW. The data are often obsolete when made available and therefore of little use. It is unfortunate that the effort of thousands of respondents completing these forms are not rewarded by at least obtaining the results of statistics which are badly needed by these individuals as well as the entire academic community.

Improving the situation does not seem to me an impossible task. HEW certainly has a large and qualified staff necessary to handle the collection, processing, tabulation, analyses and release of these statistical data.

I would not reject the provisions contained in S. 1539; however, I would explore all possible means to improve the present operation of the National Center for Educational Statistics before embarking in a costly venture of establishing a new center. What are the guarantees of better accomplishments with a new center?

With respect to H.R. 13991, I would like to suggest the mention of a time frame for the release of the results (lines 10–12).

Finally, I want to express appreciation for your effort in improving the collection of educational statistics and for the opportunity to comment on this issue. If you feel that I can be of further assistance, please do not hesitate to let me know.

Sincerely,

MARYSE EYMONERIE,
Associate Secretary and Survey Director.

INTRAN, CORP.,
Bethesda, Md., May 31, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education, U.S. House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR MR. PERKINS: I am writing in response to your letter of May 14, 1974, which solicited my opinions on matters pertaining to H.R. 13991.

In beginning, I want first to express my appreciation for your letter and for the opportunity to make my views known to a forum of considerable significance and one for which I have a great deal of respect. I should further preface my remarks by indicating that I have an interest in matters pertaining to the collection and dissemination of educational statistics, and feel qualified in expressing my opinions on such matters, as a result of extensive experience in precisely those activities while subcontracting in recent years to numerous non-profit organizations and research firms in pursuit of these matters. Intran Corporation is a data processing service organization which specializes in survey processing and test scoring through optical scanning.

I, too, feel that improvement is needed in the job which the Federal Government is doing in collecting and disseminating educational statistics and am very much in favor of a Bill which could lead to improvement of the situation. As regards H.R. 13991—I am in full agreement with its provisions as expressed, i.e., as statements of what would generally be a promising situation if each of your recommendations were to become actual modes of operation, but find its provisions too broadly expressed to permit me to comment more specifically.

My view on the present state of the collection and dissemination of educational statistics in the country is couched almost entirely in terms of the Federal role because nearly all of such activities with which I am familiar are entirely supported directly by Federal funds. The majority of the projects with which I am familiar, and whose objects are those activities, originate from the U.S.O.E.'s National Center for Education Statistics (NCES), while others are supported by contracts and grants from other Federal agencies such as the National Institutes for Health, the National Institute for Mental Health, and the National Science Foundation. (I mention these other agencies only brifly at this point because I see as one of the problems the fact that there is a seeming needless duplication of effort—particularly as regards certain statistics on higher education. A single agency mandated with the production of educational statistics to meet all Federal Government needs would, in my view, be considerably more effective.)

The general state of these areas seems to be that entirely too much time is consumed in the collection of data and the production of statistics and that the dissemination of needed statistics is inadequate at best—the dissemination never takes place, or the disseminaton takes place too late and/or to too narrow or limited an audience to have the originally intended effect.

Heretofore NCES announced its RFPs too late, and consequently awarded contracts too late, to allow for adequate preparation by the contractor to acquire data and produce statistics in the best possible manner. I suspect that this may very well in good part have been due to poor planning on the part of other OE agencies in providing adequate definition and forecast of data needs. This situation does seem to have improved somewhat, but contracts are more often than not awarded late or at the very last possible moment (June 30). Contracts now seem to get off to a somewhat improved start but become bogged down very quickly at the first point in the schedule requiring OE review and approval prior to continuation by the contractor. Considerable delays—two, three, and four times the agreed-upon schedule—are not unusual. (Such delays, by the way, play a heavy part in contributing to high contractor overhead rates.) The most significant delay is experienced with the preparation of an OMB Clearance package. Too often there is a lack of input from OE adequate to preclude rewriting the technical supporting statement. What input there exists is often not coordinated, such that every level of review produces additional change. There seems to be little that most Contract Monitors can do to obtain an effective commitment from the OE Clearance office as to when that office will clear a package and/or questionnaires. It would seem that this office is overburdened or understaffed. But, the most significant delay occurs after the package goes to OMB. A recent example of the kind of thing that can happen would be:

11/30/73: Contractor submits complete Clearance package
1/17/74: Package submitted to OMB
2/04/74: Planned survey mail date
3/21/74: Clearance received from OMB

This very extensive survey package could not be completed for mailing until April 12. This is a very bad time of the year for collecting data in schools and school districts. We have a very good idea now from the poor response rate and the post-survey validation checks that the survey results will be questionable and diluted at best. A side issue is that the prime contractor was unable to plan anything while experiencing the delays described above. It is hard to get effective use of personnel time in this fashion.

The above are only examples of the kinds of problems that are experienced. I am aware that there must be further problems internal to NCES or OE that cause further delays. On many occasions I, or my clients, have a need to use NCES statistical publications. I am amazed at times at how old the most current data often is. In some instances I've been aware that the contract had been completed for as much as a couple of years—and yet the data simply was not available. In other instances, data is available but not in a published form. If you can't go directly to OE's offices and if you don't ask the right questions of the right people, you'd never know it exists.

I'm reminded of one further point that has a bearing on the data collection problems. The OE is obviously very dependent on the schools and school districts and states to provide the required data. Things I've heard and seen tell me that the necessary mutual-cooperation atmosphere that is needed is slowly deteriorating. Because of many of the contract problems referred to above, unreasonable demands or requests have often been made. All too often the states or local people do not receive the promised feedback—or don't receive it in a timely fashion. Amends will probably have to be made before data collection can occur in the originally planned effective manner.

To briefly answer your second question, I would say that there are two general ways that the situation could be improved. The first is that there should be a consolidated information gathering system. The second is that perhaps an agency of much higher authority than the present NCES agency should be responsible for this effort.

There is currently an effort underway within NCES called CCD-70 that could possibly satisfy the first point. I think it is a step in the right direction. However, I am discouraged that this effort has been going on for three years or better and still has a very long way to go. I understand that there has been a lack of concerted agreement within OE about its development and understand further that there has been a considerable lack of funds available to enhance its development.

I think that the present NCES agency is subject to so many demands for its services from so many different directions and levels that it may be very difficult for this agency to improve its situation very quickly. I suspect that for an agency to be effective in carrying out the work needed to satisfy the expected outputs of the present NCES, that the decisions governing what the agency will or will not do and how they will be done have to be made at a much higher level than is presently the case. The proposal, as I understand it, contained in S.1539 would put the head of the new NCES at the same level as the Commissioner of Education and the Director of NIE. I think this is the higher level that I refer to that would be needed to make the agency effective and to make it more capable and responsible to the needs of Congress in determining whether or not present educational programs are operating as intended. I don't have time at this point to go into a more detailed explanation of why I think this is so.

I have one, and only one, basic difficulty with this approach: the new agency would remain saddled with the requirement that all questionnaires would have to be cleared through OMB. I'm not sure what can be done about that problem. Consequently I would like to see some thought directed toward exploring whether or not the GAO or the Congressional Research Service might not be a more effective alternative in determining a single agency that would be responsible for developing a consolidated information gathering and reporting system for educational statistics. My more limited experience with these agencies tells me that they seem to be more capable of being responsive to the needs of Congress, and I think that Congressmen are the ones with the greatest need to know.

Hopefully the preceeding paragraphs have also provided an adequate answer as to your question on my opinion regarding the provisions in S.1539.

Once again I am most appreciative of the opportunity to express my views on this most vital issue. I would be most glad to provide any further clarification on these points that your staff may find desirable.

Respectfully yours,

DENNIS A. DILLON,
Vice President.

Texas Education Agency,
Austin, Texas, May 23, 1974.

Hon. Carl D. Perkins,
Chairman, General Subcommittee on Education, House of Representatives, Congress of the United States, Rayburn House Office Building, Washington, D.C.

Dear Mr. Perkins: Your letter of May 14, 1974 and a copy of HR 13991 has been received. In recent years some progress has been made by DHEW, Office of Education in consolidation and improving their information needs. Generally, state education agencies and local education agencies are represented by the Council of Chief State School Officers as this progress has been influenced by these groups. However, I appreciate the opportunity to respond to the three questions asked in your letter as well as to the bill itself. Responses to your questions are numbered to correspond to the questions:

(1) *Present state of the collection and, dissemination of educational statistics, especially as regards the Federal role?*

Answers:

A. Data collected at the federal level is not always fully justified.

B. Data that is collected is not even across offices and programs.

C. Some data requests are levied that local school districts have no system for collection.

D. Federal contractors who seek to collect data are sometimes offensive to state education agencies and local education agencies.

E. Collection is slow and cumbersome because of states differences.

F. Data is collected by several different federal agencies with not enough planning for coordination.

G. Common use of data through an integrated data base appears impossible to achieve.

H. Data for federal program management and data for exclusive decisions should flow together; usually they do not.

I. Increased need for data at all levels has pushed local education agencies almost to a point of inability to supply.

J. Current data dissemination from the federal level is of little value at the state and local level in this state because of the time lag.

(2) *How can this situation be improved?*

Answers:

A. By designing and implementing an information system at the local education agency, and state education agency levels that would contain a common core of data to serve federal and state information needs.

B. Such a common core of data system development would involve appropriate representatives from the state education agencies and local education agencies.

C. Such envisioned information flow would make use of the latest computer technology to enhance speed and accuracy.

D. State education agencies must be responsible for developing and implementing the common core of data for local education agencies within each state.

E. Only one system must be implemented. The country cannot afford duplication.

F. Dissemination of educational statistics at the federal level can be improved by:

1. Adequate staff to collect, inspect, treat, and publish information compiled from the data collected.
2. Integrated data base on an adequate computer devise to expedite ease of access.

(3) *Creation of new Federal Agency for educational statistics?*

Answer:

A way must be found at the federal level to make optimum use of the data collected. This must insure that each data item is collected only once for each time frame. Included must be data for program management as well as data for executive management, and for the Congress. If the only way to accomplish this is through the creation of a new Federal Agency for educational statistics, then this might be a desirable alternative.

My reaction to HR 13991 itself is one of support. You have shown much depth and understanding of the problem. I would recommend that the Council of Chief

State School Officers be involved in continuing to represent state and local education agencies as the feasibility study is conducted.

Sincerely yours,

JERRY T. BARTON,
Director of Research,
Research Office, MIC.

STATE OF IOWA,
DEPARTMENT OF PUBLIC INSTRUCTION,
Des Moines, June 3, 1974.

Representative CARL D. PERKINS,
Chairman, Committee on Education and Labor, General Subcommittee on Education, House of Representatives, Rayburn House Office Building, Washington, D.C.

DEAR REPRESENTATIVE PERKINS: Your letter of May 14 requesting views concerning the improvement of the collection and dissemination of educational statistics was certainly welcomed in this office. The Iowa Department of Public Instruction spends a great deal of time and money for the enhancement of educational statistics and information systems for every level—local, state, and Federal. The Federal role in data collection and our trying to assist them with their data needs have been of particular concern for the past several years.

The bill, H.R. 13991, mandating a report resulting from a feasibility study with respect to data collection is one of merit. However, I believe its key to success is the development of the criteria and specifications which defines the problem and explicates the procedures with expected outcomes. I think your bill recognizes this fact with its inclusion of the seven points:

1. Point #1 illustrates the need for specific definition (and agreement) of "collecting, organizing, and reporting full and complete statistical information . . ."

2. Perhaps I illustrate a bias in saying that a key issue is listed in points #3 and #4—utilization of state and local agencies. I submit the greatest single weakness in the Federal data collection process is the tendency to by-pass these agencies in the formative stages and state educational agencies (SEA's) even in the collection process. This is not to imply that all state educational agencies can furnish needed data as they should. However, an all-out effort should be made from the Federal level to assist SEA's in performing needed functions—flexible, automated information systems. There have been and are some efforts to do this, but these efforts have been fragmented and lack the cooperation and overall direction to be successful. We need a well-defined multi-year plan that can be carried through to implementation. Congress and the Federal agencies have been discouraged from undertaking long-range projects, but only by starting now will we be better off in five or ten years. It will cost money—a great deal of money, but not nearly as much as it will cost if we do nothing.

3. If my observation above is accurate concerning the greatest weakness, then the second greatest weakness is the lack of "coordinating the statistical information gathering with other Federal agencies"—your statement made in point #5.

In summary of H.R. 13991, I think the bill is one which should be enacted and the key to its successful completion is "how" it is done and "by whom." By this statement, I mean that it is probably more important for key leaders to agree to what is to be done and to firmly commit to the solution of this complex problem (then the assignment of resources—time, personnel, and money—to that solution) than it is to give a contract to an outside agency merely to do a feasibility study.

In discussing the other questions you posed in your letter, I would like to take this opportunity to bring you up-to-date on action taken by the Council of Chief State School Officers (and each respective superintendent or commissioner) which established the Committee on Evaluation and Information Systems (CEIS) to provide a single coordinated effort in meeting concerns and in formulating recommendations in the area of Federal/state/local educational information systems. To date, perhaps this group's greatest effort has been expended assisting with the coordination of the Federal Annual Data Plan. The result? More frustrations! I certainly do not want to minimize the work of these people nor do I want to boast that all problems have been solved, however, I do want to illustrate the effort and commitment of the Chiefs reflecting their desire to produce a solution to the problem.

Missing in the Federal role regarding educational statistics is a clear definition of purpose and the delineation of the scope of its role and responsibility. The categorical aid programs of the past have brought about their respective application-oriented data collection instruments. Without the great proliferation of words, suffice it to say these data collection procedures have not solved the problem of educational statistics nor have they been successful in doing what they purported to do for a given program. While objective data for program evaluation are important, so is the subjective opinion of the people involved. I would submit this can best be done by the people at the local district level, accomplished only minimally at the intermediate or state level even with well-designed studies, and almost never accomplished at the Federal level. The critical need for educational statistics and program data by Congress and all Federal agencies must be weighed against what can be promptly and accurately collected and processed in a cost-effective manner. Thus, of paramount importance is the definition and agreement of the scope of the Federal agency in data collection and dissemination of educational statistics.

I would be less than candid if I responded with great enthusiasm to the possibility of having a new Federal agency created for educational statistics. This possibility poses more questions to me than I can answer. It has been my experience that if one agency is failing to function, the mere creation of a new stand-alone agency will probably be no better. I know it is still early in its development, but I cite the National Institute of Education as an example—now we expend a great deal of our effort in coordination of these agencies. Perhaps a more prudent approach would be to identify problem areas in the current framework and develop corrective measures. It is essential to have people who understand the problem and are dedicated to its solution. They must also understand state and local school systems.

I must hasten to add, however, that if information systems are to function, a central unit is fundamental to the concept. A central unit must have the authority and responsibility of forms management, data collection, processing, use and dissemination of information. (I have attached a draft of a position paper for state educational agencies which deals with this problem. It has not been presented and accepted by the CEIS organization; so I must reiterate, it is a draft.) This same concept might be applied to the Federal level—I believe, though, the central unit should be within U.S. Office of Education, not outside. This raises the question about the coordination with other agencies on educational data—they should work through this central unit which in turn works through SEA's when collecting educational data—data whose source is the local school districts.

I am optimistic regarding the future and the emerging solution to the problem of data collection and educational statistics. This optimism stems from the dedication exhibited by the Council of Chief State School Officers, the appointment of people like Ted Bell and Duane Matthesis in the U.S. Office, and now the concern of leaders such as yourself. The past has shown that we cannot solve the problem as separate independent entities so now, perhaps, we are ready to join together to develop a solution. What we need is the impetus of a catalytic agent—perhaps you and other members of Congress can provide that force.

Thank you for your interest and concern in this problem area. It is a pleasure to have this opportunity to expres my views to you. I must apologize for the length of my response, but it is an important problem and one in which our Department is extremely interested. If there is anything else that I can do for you on this issue, please do not hesitate to call on me.

Sincerely,

JAMES E. MITCHELL,
Associate Superintendent,
Planning and Management Information Branch.

Enclosure:

POSITION PAPER ON FORMS MANAGEMENT FOR MANAGEMENT INFORMATION SYSTEMS

(Prepared by James E. Mitchell, Associate Superintendent, Department of Public Instruction Iowa; W. E. Ellis, Director of Research, Department of Education, South Carolina)

PREFACE

The task of developing a position paper was assigned to the writers by the CEIS Chairman, Mr. Barton (Texas), and the CEIS Executive Board at the annual meeting of October 1973. The purpose of the task was to discuss the alternatives and to state a position for the problem areas of forms management and data collection procedures. The paper is to assist state educational agencies (SEA) which are considering restructuring their operations to better meet the needs for timely information in a cost-effective method.

The writers assume responsibility for the contents of the paper, but also want to express appreciation to the many people who have assisted with its development. These include the members of the Subcommittes of CEIS—MIS/CCD and Data Standards and to the CEIS State Coordinators from California, Maryland, Michigan, and New York for the materials supplied from these states.

FORMS MANAGEMENT FOR MANAGEMENT INFORMATION SYSTEMS—A POSITION PAPER

Philosophy and Rationale

The role of the state educational agency (SEA) has shifted from inspectoral and statistical gathering to a new one which finds the agency at the hub of local, state, and federal information transmittal. This emerging role holds great promise for effective statewide improvements in education because relatively new leader-manager expectations of the SEA are beginning to crystalize. This is especially true in the area of information systems.

State Education Agencies are beginning to realize that traditional, manually operated information systems, the application-oriented systems of the past, are not meeting the demands of the present and will not meet the demands of the future. Such systems are not efficient, accurate, or timely and are not economical in terms of cost benefits. Increased demands for better quality, greater quantity, and faster retrieval of data have caused SEA's to focus upon more efficient information management practices.

A viable information system is an organized arrangement for making the right information available to those who need it, when they need it, in the desired format and at least possible cost. The use of a systems approach is the key to dealing with information in that it provides systematic organization, collection procedures, processing, information dissemination, and coordination.

A statewide educational information system requires that a central body within the state education agency be given *responsibility* and *authority* for coordinating *all* data handling. The central body must be a separately organized administrative unit supported by a commitment of other parallel units within the agency.[1] Adequate staffing must be provided to assure competent leadership, continuity in development, and efficiency in operation. Requests for information from both within, and outside, the department should be channeled through this administrative unit or office. In turn, the requests should be evaluated in terms of: 1. whether the data requested are already available within the system; 2. the SEA's responsibility for providing the requested data considering the overall objectives and commitments of the agency; and 3. the feasibility of collecting new or different data, i.e., the relative value of having the data compared with the time and effort required of the school and agency personnel to get it.

Agency coordination and practical request evaluation procedures will assist in eliminating data collection that is unnecessary, undesirable, unfeasible, or redundant.

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[1] If a viable management information system is needed by one unit, it follows that all units to some extent should embrace a structural system approach to this important institutional function. Accordingly, it is strongly recommended that management information systems be coordinated at the highest possible level of the agency hierarchy. In this manner, all units may coordinate information needs.

The Problem

It has been said that to control an institution, one needs only to control the budget or the institution's information. If this is true, information management deserves the same attention as budget management. The position that is taken in this paper is that forms control is a necessary component of any attempt to manage the agency's information.

The principle underlying an information system may be simply stated: data that are accurately defined, properly collected and processed, categorized and stored can readily be retrieved and reported. Thus, there are two fundamentals of an information system: establishing a data base and retrieving data from that base (information transmittal). Although these principles may be simply stated, it is certainly much more difficult to bring them into reality. In the jargon of data processing, these two factors are referred to as input and output. The purpose of this paper is to discuss procedures for the input—management of forms for data collection.

Position

An information system can only be as good as the data from which it is built. If definitions are developed in a haphazard manner, they will be reflected in the data base. To insure that definitions are provided and understood, a systematic approach (forms management) *must* be established. Policies must be established and carried into practice which support all aspects of forms management. Purposes of forms management policies include: 1. avoid duplication of data items collected by the staff; 2. assist staff members in the design and collection documents; 3. ascertain the reasons which necessitate the collection of data; 4. review all instructions and terminology used in data collection; 5. assist staff members in determining cost effectiveness of data collection efforts; 6. cause an annual data plan to be created and enforced;[2] and 7. structuring and categorizing data and information elements.

Perhaps one more point should be added concerning accuracy. Accuracy should be the first criterion and must precede all others—if data cannot be collected accurately, it should not be collected at all.

The systematic approach to forms management should not only include the designation of a unit or section in the SEA that would perform the work of forms management, but also a representative advisory group—data users. This group of people should be primarily responsible for the data presently being collected and for its use or reports.

The users group should be *advisory* to the forms management unit which, in turn, has the responsibility of coordinating the entire data collection process. Nevertheless, both groups must be cognizant of the State and Federal requirements and sensitive to the needs of the SEA and LEA's. The shared duties should include but not be limited to the following:

1. developing the policy statements concerning data and detailed operational procedures;
2. reviewing all existing data collection requirements[3]—the result of this review would result in a data dictionary of all items, forms, and how and when the data are reported; and
3. establishing criteria to be used to evaluate new requests which must include reasons for collection, forms design, instructions, definitions, worth, and cost.

The advisory group, together with the forms management unit, must be effective in working with the SEA staff in the management and control of its data needs if the MIS function is to be effective. It must progress to the point where it is working at least one year into the future in identifying data needs and procedures.

The forms management unit, the advisory group, the establishment of viable policies, and the commitment to the entire process by the Chief State School Officer are all critical for the success of the forms management effort.

Conclusion

The principal ingredient for the success of any management information system is an active forms management process backed by the firm commitment and support of the Chief State School Officer. Without such support and authority, the system will fail. This cannot be stated strongly enough.

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[2] The management information administrative unit should be responsible for the monitoring of the forms management functions. Such monitoring must include the reporting of "bootleg" forms used by department personnel. Sometimes other units like the one screening printing requests can be invaluable in detecting forms. The forms management unit should have a "signoff."

[3] The Federal Government as well as numerous states refer to the products of this function as an annual data plan.

Control of forms should be viewed as a "positive assistance" rather than a "negative constraint." The forms management unit should be available to provide expert assistance for the layout of forms, the sequencing of data items, the wording of the questions, and the preparation of instructions. This requires specific skills which are not common among the professional staff members who have not had related training or experience.[4]

It is recommended that serious consideration be given to the establishment of a forms management unit within each state education agency. The purposes of such a unit should be to provide a ready source of information about forms and data items collected and to assist all other units within the agency in managing their data collection task and reporting needs.

STATE OF INDIANA,
STATE DEPARTMENT OF PUBLIC INSTRUCTION,
Indianapolis, June 7, 1974.

HON. CARL D. PERKINS,
Chairman, House of Representatives, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR MR. PERKINS: The important feature of S1539 seems to be that the National Center for Education Statistics would be placed directly under the Assistant Secretary for Education as an independent agency rather than remain under the office of Education. The need for this change appears to be that the Center now is so closely identified with the on-going programs of OE that the Center is unable to place sufficient priority on the collection of data that would help the Congress make decisions on needed lgislation.

We have had a very good relationship with the National Center. They seem to be doing a commendable job. Evidently, however, they have not been able to supply congressional committees with information needed for legislative decision.

The collection and dissemination of educational statistics is a very difficult task. Not only must the informational needs of on-going programs be satisfied, but also statistics must be gathered to help determine possible legislative changes.

It would seem to us that the passage of this bill making the Center an independent agency would be a step in the right direction.

Yours very truly,

DR. MARION W. COPLEN, *Director.*

ASSOCIATION OF COMMUNITY COLLEGE TRUSTEES,
Washington, D.C., June 4, 1974.

HON. CARL D. PERKINS,
*House of Representatives, Rayburn House Office Building,
Washington, D.C.*

DEAR CONGRESSMAN PERKINS: The Association of Community College Trustees supports H.R. 13991. During a period of increasing financial constraints facing every segment of education, with taxpayers in revolt against an ever increasing tax burden, the concept of greater accountability in education looms even more important.

The one key ingredient needed to prove or refute much of what educators say they need and much of what their critics say they do not need, is reliable up-to-date and readily available educational statistics.

Members of the Congress and the Department of Health, Education and Welfare are also in need of reliable educational statistics.

What is also needed is a uniform language of educational dialogue that means the same thing country wide. Such terms as FTE (full time equivalent), full time student, part time student, length of a semester or quarter, school year, full school day, teacher load, etc. generally mean different things in different states. It is impossible to compare the cost of instruction between the various states and, therefore, for the nation.

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[4] This does not mean that management information system staff are capable of meeting all users needs. Data collection ranges from an exact science to a "black art." No management information function can meet all needs—the state-of-the-art of measure in the human science doesn't provide such luxury.

Lastly, the Federal Government should abolish all educational statistic gathering entities but one. To that agency give full authority and responsibility for data gathering and dissemination. Then, hold that department accountable for correctness, timeliness and availability of the information.

This association views the present federal collection and dissemination of educational statistics as unsatisfactory. By the time we get them they are too old to be of any value to us. Even if they were up-to-date, how can they be reliable because of the differing educational definitions (indicated above)?

The situation can be improved but it will take a national overhaul. At the same time, care must be exercised that the creation of federal standards will not lead to an increase in the federal controls, a reduction in local control and a conformity of educational programs.

Regarding S. 1539, Title V, Sec. 406, (established a new) National Center for Educational Statistics we have serious doubts that this new Center will produce any better services than the present Center. We would support this section of S. 1539 only if the new Center is held "accountable" to produce acceptable services.

Sincerely yours,

William H. Meardy,
Executive Director.

American Personnel and Guidance Association,
Washington, D.C., June 14, 1974.

Hon. Carl D. Perkins,
Chairman, Committee on Education and Labor, U.S. House of Representatives, Rayburn House Office Building,
Washington, D.C.

Dear Mr. Perkins: In response to your May 7, 1974 letter request on H.R. 13991. I polled our leaders in guidance and counseling throughout the country. Essentially, from their responses and from the Association's direct dealings with the Federal Government relative to educational statistics, the problem seems to center on several points:

1. Too many departments, centers and institutes in the Federal government seem to be collecting statistics that directly, or indirectly, relate to education (e.g) USDL's Bureau of Labor Statistics, Bureau of Census, NIE, NCES, USOE, DOD, USDA, etc.

2. There doesn't seem to be any coordinating body to identify what statistics are needed and to determine that the statistics gathered are uniform, nonconflicting and comprehensive.

3. There doesn't seem to be any regular way for educational groups, public and private, to uniformly access the existing melange and to be reasonably sure that their legitimate statistical information needs will be met.

4. There has to be a legitimate rationale and controls for collecting educational statistics. Collecting just to accumulate data can be frustrating to the suppliers of data if the purposes aren't clear and a response to their needs; if uses and dissemination plans aren't outlined; and if there aren't privacy and confidentiality controls on the information and who may access it. The latter point, in this age of computers and governmental spying in high places, is making the citizenry increasingly nervous and sensitive about any data collection of a personal nature.

5. Once data is collected and disseminated, a National Center has to be particularly concerned with follow-up. There should be user surveys asking for suggestions to improve the service and determining use of statistics provided, so that administrative ease doesn't determine what's collected, but need!

6. A long planning phase, appropriately task forced and representative of the educational community (national, state and local representatives as well as public, private, commercial and non-profit), is most important. Such planning should attempt to develop a uniform set of terminology (e.g.) definitions, matrices and categories, as well as consider those points I have mentioned earlier of needs, accessability, dissemination, confidentiality, follow-up, etc.

I did have an opportunity to review Section 501 of S. 1539. I am not sure if the authorization of $20,000,000 for start up is high enough. If this National

Center for Educational Statistics is to be viable, it must be timely and responsive. To me this means outstanding leadership, a well staffed operation at every level and facet (e.g.) statisticians, program developers, researchers, technicians, audio-visual specialists, publications and communications experts and clerical support, plus the latest in technical, audio-visual, communication and computer equipment. S. 1539 should specify that all legitimate interests will be given an opportunity to seek educational statistical assistance.

I was especially impressed and pleased that one of the National Center's roles would be to regularly supply Congress and other Departments of government with up to date educational data for better decision making and legislation. Section 406(f)(2)(D) is still bothersome in the amended version, especially its implications for violations of privacy of test data; personal information; sexist, agist or racist misinterpretations; and unfair comparisons of unlike states, regions, cities, youth and adults, institutions or school systems.

Given the above, I still feel, as does our Association, that there is a tremendous dearth of information about the educational enterprise and APGA would like to encourage you, Mr. Chairman, to move actively toward the development of a National Center.

If the Association or its leadership can be of any further help to you, please do not hesitate to call upon us.

Sincerely,

PATRICK J. McDONOUGH,
Assistant Executive Director for Professional Affairs.

UNITED STATES CATHOLIC CONFERENCE,
OFFICE OF GOVERNMENT LIAISON,
Washington, D.C., July 1, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education and Labor, House of Representatives,
Washington, D.C.

DEAR MR. CHAIRMAN: I am writing in response to your recent letter regarding proposed legislation to improve the collection and dissemination of educational statistics.

I referred your request for comment to Dr. Edward D'Alessio of the U.S. Catholic Conference Elementary and Secondary Education Division. Dr. D'Alessio's response is enclosed.

Dr. D'Alessio also notified both the Council for American Private Education and the National Catholic Education Association concerning your request. I understand that both of these organizations have submitted separated comments.

I hope you will find these comments useful in your continuing efforts to improve elementary and secondary education.

If we can be of any further assistance, do not hesitate to call on us.

Sincerely,

JAMES L. ROBINSON, *Director.*

UNITED STATES CATHOLIC CONFERENCE,
DIVISION OF ELEMENTARY AND SECONDARY EDUCATION,
Washington, D.C., June 28, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education and Labor
General Subcommittee on Education,
U.S. House of Representatives,
Rayburn House Office Building,
Washington, D.C.

DEAR MR. PERKINS: The United States Catholic Conference gratefully acknowledges your invitation to respond to the questions you have raised with regard to improving the collection and dissemination of educational statistics. This issue is a major concern for the Catholic elementary and secondary school community. Current and accurate national statistics regarding the extent of participation of eligible nonpublic school children in Federal education programs is not available. The National Center for Educational Statistics, despite the legislatively mandated participation of these children in many of these programs, does not make clear provisions for collecting data regarding nonpublic school children. The NCES data retrieval form does not provide a line item specifically requesting information regarding participation of nonpublic school children in each program. NCES collects data on the total number of children participating in specific programs and then extrapolates to arrive at the number of nonpublic children who participate in the program. Such a system does not lend itself to accurate reporting and is inadequate.

As you have heard in the testimony before the Committee on many occasions, eligible nonpublic school children and teachers often do not participate on an equitable basis in many of these programs. As the Committee has been very helpful in responding to these problems, we feel that you will appreciate the inappropriateness of the extrapolation approach. We feel that the data collection could be greatly improved and accurate information obtained if the NCES developed a new data retrieval form with a line item requesting a breakdown of the population participating in a particular program into both public and nonpublic school participants as well as the total student population.

Since the NCES is dependent upon the local educational agency for reporting the number of participants in particular programs, we also suggest that the local educational agency be required to submit such report forms to the responsible nonpublic school official in that area to verify the accuracy of the data. Such a procedure will not only assist in gathering necessary and accurate data, but it will also hold both educational communities accountable for cooperating and collaborating for the educational betterment of all children.

As you are well aware, Mr. Chairman, the two to three year lag in publication of these statistics has considerably diminished their usefulness of educators and educational administrators.

We appreciate your efforts to improve the present situation with regard to educational statistics and would be ready to provide further testimony in this regard.

Thank you for the opportunity to participate in the Subcommittee's consideration of this important issue.

Sincerely,

Edward R. D'Alessio, Ph. D., *Director.*

The University of Michigan,
School of Education,
Ann Arbor, Mich., June 10, 1974.

Hon. Carl Perkins,
Chairman, House Committee on Education and Labor,
House of Representatives,
Washington, D.C.

Dear Carl: This is in reply to your letter asking for comments on H.R. 13991 and the provisions of S.1539 relating to Educational Statistics Services and Studies. This letter represents our response as members of the Legislative Liaison and Planning Committee of the Association of Schools and Colleges of Education in State Universities and Land-Grant Colleges.

It is apparent that the Congress, the American people, and educational personnel need more and better educational information on which to make policy decisions. We whole-heartedly endorse the Congressional effort to improve the educational data-gathering process and to publish and dissminate the informatoin more promptly.

The National Center for Educational Statistics, in our opinion, provides a sound organization and professional basis for the extension and expansion envisioned in the pending legislation. Basically, what is needed is a substantial increase in federal appropriations by the Congress to the Center. No organizational changes are needed; more money over a period of time would do the job.

However, we believe that some statutory provisions spelling out informational needs in general would help the House and Senate Appropriations Committees and the Executive Branch to carry out the Congressional intent as set forth by the substantive legislatives of the Congress. We would prefer to leave specific dates and details to the Appropriations Committee reports rather than to prescribe them in the basic law. In this way, there could be some flexibility in meeting the Congressional requirements so that the responses could be adjusted if necessary in the light of unforeseen developments. We would support the provisions of H.R. 13991 relative to any study of these important matters as outlined in the provisions of the bill.

We would hope that any legislation dealing with this vital matter would involve some of the Deans of the Schools of Educations who are and have been intimately concerned with these problems. We offer our professional assistance in the administrative implementation of any provisions which are recommended by your Committee and enacted by the Congress.

Sincerely,

Wilbur J. Cohen, Dean, School of Education, The University of Michigan; David Clark, Dean, School of Education, Indiana University; Robert Egbert, Dean, Teachers College, University of Nebraska; Robert Gilberts, Dean, School of Education, University of Oregon; David R. Krathwohl, Dean, School of Education, Syracuse University; Truman Pierce, Dean, School of Education, Auburn University.

NATIONAL EDUCATION ASSOCIATION,
Washington, D.C., May 31, 1974.

Mr. JOHN F. JENNINGS,
Rayburn House Office Building
Washington, D.C.

DEAR JACK: The provision of H.R. 69 with regard to NCES, if passed soon, would set up a reasonable time period for the Secretary of HEW to develop a plan to provide educational statistics as required by seven stipulations of the bill.

The major problem with NCES as I see it is its extremely low priority. This low priority is a factor at every contact point in the collection and dissemination of statistics. The Center has been understaffed and underfinanced, and buffeted by criticism on all fronts. Educational statistics have little priority at the state and local level and little priority at the federal level. The one thing everyone agrees upon is that some kind of a new start for the Center is imperative.

It is NEA's opinion that the Center should be capable of both the compilation of basic educational data and the analysis of data for policy determination. We also believe that the proper organizational arrangement for NCES is where it is, an administrative unit of the Office of Education.

Much thought should be given to increasing the ability of NCES to collect statistics from state and local school systems. Two approaches should be considered: (1) the Center could be the collection point for all information needed for the administration of formula and discretionary grants; (2) OE could pay for the data requested, or pay for the establishment of a data system at the state and local levels.

Even were the data collection completely feasible, NCES has low priority in staffing, preparation of data for the computer, clearance for publication, and publication itself. An Act of Congress such as this provision might help improve this low status.

In regard to analysis of data for policy determination, much of the testimony the Committee has received indicates that the expectation for data for policy determination is far too great and that the system required, if carried to the nth, would be costly.

The first emphasis should be on the gathering, processing, and disseminating basic data.

One very important issue in the collection of the needed information on pupils and teachers necessary for policy analysis is the potential abuse of the individual's right to privacy. The computer is generally feared as an invader of privacy, and educational data certainly are not collected under the guarantee of privacy that Census or Internal Revenue enjoy. Computer systems at the local, state, and federal levels are equally suspect. Guarantees of privacy of data on test scores of individual pupils and teacher evaluations are difficult to design, *especially when private contractors are used to process the data.*

One other point should be made. In the process of the search for a data system to serve needs at the state and local level, the data systems of the LEA's and

SEA's have become more divergent, rather than less, from the standard definitions under which OE collects data. A few states cannot now supply any data in the form requested by OE without estimation. Some locals now have data systems so different from the state's that state-requested data is supplied by guess. The more time which elapses before OE gets a firm control on basic data, the more divergent the data systems will become.

Over the years users of data have relied heavily on NEA Research for the production of basic data. To some extent, this has been a continual put-down to NCES and a growing expense for NEA. NEA believes that the production of basic data should now be left to NCES insofar as possible.

I would be most willing to discuss with you ways in which OE could pick up series now produced by NEA. If you have questions regarding the comments above, please feel free to call.

Sincerely,

JEAN FLANIGAN,
Director, NEA Research.

ASSOCIATION FOR EDUCATIONAL COMMUNICATIONS & TECHNOLOGY,
Washington, D.C., June 7, 1974.

Hon. CARL D. PERKINS,
U.S. House of Representatives,
Rayburn Building
Washington, D.C.

DEAR CONGRESSMAN PERKINS: I am writing in reply to your letter of May 17 asking for information concerning the state of educational statistics gathering today, particularly as considered in HR 13991 and the Senate version of H.R. 69.

I am writing as a representative of the Association for Educational Communications and Technology (AECT), an educational association of 8,000 members including technology and media education professionals in all levels of education, in government, the Armed Forces and industry.

One of the most difficult problems confronting those of us concerned with and working in the education field is the lack of timely and reliable data necessary to weigh alternatives, make decisions and plan for the future. The AECT advocates the use of educational technology and believes technology can make a substantial positive impact on the educational system today. We have seen it work in local schools, but without reliable nationwide data on the present state of education, the needs of today's students, the successes and failures of today's programs, it is extremely difficult to determine just what is needed and what impact is being made.

In order to insure technology is properly employed in education, very rational decisions must be made on reliable data provided in great detail. For instance, any administrator, when presented with the fact that more than 90% of the current educational dollar goes into personnel salaries, must look for alternative and more effective ways of spending that dollar. Information on these alternatives must be provided. We feel such data would prove our case that technology is an efficient and effective method of instruction. Such data, in the long run, could increase the effectiveness of education for today's student as well as decrease the per pupil cost of that education. The statistical data capable of being rendered by a well organized national effect would inevitably help in directly improving our educational efforts.

Every year as we prepare testimony for the Appropriations Committees we are appalled at the lack of a data base on which to make recommendations, just as you are appalled at the same lack of data for decisionmaking. The data that is available doesn't cover many critical areas, is not reliable, and is frequently not available in a usable format.

Collecting and disseminating statistics is an expensive operation and requires Federal support to be accomplished.

Some statistics-gathering functions are now being performed by the U.S. Office of Education but the effort is at a low and inadequate level. Information is gathered on an as needed basis with little overall planning and no high level of guidance as to what information should be collected on a regular basis and how this information should be organized and disseminated. The present National Center for Educational Statistics (NCES) reports through a Deputy Commissioner to the Commissioner of Education. It has no specific statutory authority and has been consistently underfunded and understaffed.

In our view there are three (3) alternatvies that could be pursued to improve the statistics gathering and dissemination capabilities of the Federal educational establishment.

1. NCES as it is currently established in USOE could be continued but with increased guidance from Congress and from top level USOE and HEW officials. Increased funding and visability are also necessary. This alternative would eliminate the need for start-up costs of establishing a new agency. It would also save duplication of support activities such as a grants and contracts mechanism, a personnel office and other services the current NCES borrows from USOE.

This is probably the best alternative under ideal conditions, but under the current administration it may be difficult to accomplish since action is left in administration hands. Secretary Weinburger has opposed creation of a separate and independent NCES saying the additional funds should be applied to improving procedures in the existing setting, but the administration has not requested any additional funding. In fact, for FY75 only support for salaries and expenses is requested; no program funds are included.

2. The opposite alternative calls for the establishment of a separate and independent NCES such as that proposed in the Senate version of HR 69. This alternative would require increased costs for set-ups and support activities. There could be a coordination and duplication problem as on-going programs in USOE and NIE continue to collect statistics for their own programs. As an independent NCES became more powerful there would be a danger of new organizations being built on state and local levels for the specific purposes of collecting statistics.

Despite the disadvantages, a separate NCES could provide the visability needed to stress the importance of data collection and dissemination. Nonpartisan administration, adequate analyses of data and forward planning could be provided through the supervision of the proposed *National Board*.

3. A third alternative is that proposed in H.R. 13991, a feasibility study to determine how best to collect educational statistics. This study could provide much useful data and could, in the end, save money. However, it leaves the study in the hands of present HEW officials who have done little to improve data collection. And it delays the adequate collection of data another year which could be detrimental in a year of new legislation like HR 69.

All the above discussed alternatives have their pros and cons. Weighing the alternatives, the AECT favors alternative #1, maintaining NCES within OE, but with the provision that Congress outline the functions (such as those listed in HR 13991) to be performed and mandate the elevation of NCES to a status reporting directly to the Commissioner of Education. Congress should also be responsible for increased funding and staffing for NCES. The precedent for such an action was set with the elevation of the Bureau of the Handicapped to a level reporting directly to the Commissioner.

This would seem to provide the optimum situation—visability, stature, increased guidance and funding but continued reliance on OE support function. It could also reduce the coordination and duplication problem.

Whatever course is taken by the Congress, there are several characteristics that should be included in an NCES. Such an organization should be capable of providing grant and contracts to public and private nonprofit agencies to assist in the accomplishment of its mission. It should be able to provide state and local agencies technical assistance and funding to improve their data collection systems, but should not make it necessary for these agencies to set up elaborate collection mechanisms. Care should be taken by the organization to see that confidentiality of student's records are maintained and that their right to privacy is not violated.

I hope these views will be helpful to the Subcommittee. I encourage you to take action soon as we continue to lose time and much valuable data. Thank you for your concern and this opportunity to help.

Sincerely,

HOWARD B. HITCHENS
Director, AECT.

Lynchburg College,
Randolph-Macon Woman's College,
Sweet Briar College,
June 7, 1974.

Hon. Carl D. Perkins,
House of Representatives,
Committee on Education and Labor,
Rayburn House Office Building,

Dear Mr. Perkins: I appreciated receiving your letter of May 7, 1974 including the statement on the issue of educational statistics. H.R. 13991, in broad terms, addresses a problem with broad dimensions. Lacking other legislation focusing on the collection and dissemination of educational statistics, this bill should initiate action to improve the quality of data and judgment based on these data.

As a member of the National Advisory Council on Education Professions Development, I have become increasingly aware and concerned with the lack of completeness of educational statistics from any source approached. The non-governmental sources of data tend to reflect bias of special interest groups because of their large but still limited constituencies. Data relating to competence of teachers, numbers of teachers, and employment or unemployment of teachers is either lacking in the first case or based on certification figures or figures supplied by schools of education. A recent study by the Comptroller General in *Supply and Demand Conditions For Teachers and Implications For Federal Programs*, attempts to attack the data collection from a direction to eliminate certain biases, but fails to consider minorities and women. The private and propriatary sectors are apparently not included among the sources covered.

In my regular professional capacity as Coordinator of Government Relations and Inter-College Sponsored Programs of Lynchburg College, Randolph-Macon Woman's College, and Sweet Briar College, we constantly find statistics provided by the Office of Education are so late that they are incompetent. For example, figures on degrees awarded, or distribution of degrees by discipline, are gathered from colleges and universities and published a year or more later. The analysis of such data to determine enrollment trends and student needs or interests is made out of any timely sequence with obvious trends and influences of national character.

How can the situation be improved? Certainly a comprehensive study and recommendation for one centralized data collection and dissemination system is in order. There needs to be more definition of the scope of the activity proposed in your legislation, but I personally would support the concept you have indicated. This topic was discussed only briefly at the recent National Advisory Council on Education Professions Development since word of your proposed legislation did not come in time to get on the formal agenda. I am acting chairman of the Council and will gladly see that it is a topic at the next meeting. The new Executive Director, Dr. George Arnstein, is already aware of the matter.

Sincerely yours,

Julia M. Jacobsen,
Coordinator of Government Relations.

American Council on Education,
Washington, D.C., June 7, 1974.

Hon. Carl D. Perkins,
Chairman, Committee on Education and Labor,
U.S. House of Representatives,
Washington, D.C.

Dear Mr. Chairman: Thank you for your inquiry about our reaction to the bill you and Mr. Quie introduced, H.R. 13991, on the subject of educational statistics. I had hoped to be able to respond much earlier, but in our discussions here we were so convinced that the topic is of fundamental importance that we decided to devote considerable study to it. The result, of course, has been the delay in our response.

I hope that the enclosed statement will be useful to you both in connection with your own bill and in connection with the current conference with the

Senate. If we can supply further information or explanatoin, do not hesitate to call us.

Sincerely yours,

JOHN F. MORSE, *Director.*

Enclosure:

AMERICAN COUNCIL ON EDUCATION STATEMENT ON H.R. 13991

The American Council on Education strongly supports H.R. 13991, and urges its enactment for the following principal reasons:

1. The present state of the collection, analysis, and dissemination of educational statistics is highly unsatisfactory.

2. Improvement in the national system of educational statistics is critically important to the formulation and implementation of sound public policies at all levels of education.

3. H.R. 13991 could serve as an effective means of insuring that the Department of Health, Education and Welfare seriously undertake the development and financing of an adequate national program for educational statisteis—a responsibility that this agency has thus far failed to discharge satisfactorily.

For reasons to be outlined later, the American Council on Education believes that the approach to this problem represented in H.R. 13991 is preferable to that proposed in S. 1539.

The American Council on Education is an association whose membership comprises some 70 percent of the accredited non-profit institutions of American higher education and more than 100 educational organizations concerned with various sectors of postsecondary education. Its Commission on Governmental Relations has considered this issue and is in general accord with this statement.

The Present State of Educational Statistics

Numerous commissions, task forces, and individual scholars have issued evaluative reports in recent years on the state of educational statistics in this country. Virtually all of them have come to essentially the same general conclusions regarding the inadequacies of the present system—if, indeed, the term "system" can be meaningfully applied to the massive and largely unorganized bodies of statistical data on education that have been collected by national, state, and local agencies as well as by private research organizations. The lack of a national reference inventory of these existing bodies of data—with records of their properties and availability—constitutes, in fact, a pertinent commentary on the present state of educational statistics.

Most of the studies and reports on this subject have been concerned with the arrangements of the federal government for collecting, analyzing, and disseminating statistical data for the nation as a whole. Historically, these functions have been primarily the responsibility of the U.S. Office of Education; and it is towards the assessment of the effectiveness of that agency in meeting this responsibility that most of the recent studies have been directed. Among them are the following:

1. Robert J. Goettel and Josel S. Berke, *Improving Information Systems For Educational Policy-making.* Washington: President's Commission on school Finance, 1972.

2. *Data and Decision-making in Postsecondary Education*, Report of a Task Force of the Department of Health, Education, and Welfare (Frank Newman, Chairman). *Chronicle of Higher Education*, March 12, 1973, pp. 25–27.

3. *Financing Postsecondary Education in the United States.* Report of the National Commission on the Financing of Postsecondary Education (Donald E. Leonard, Chairman) (especially Ch. 8).

The principal shortcomings of USOE as a national center for educational information—as emphasized in these and other reports—may be summarized as follows:

1. At all levels of education there are serious gaps in the data collected by USOE's National Center for Educational Statistics (NCES) as measured by the policy needs of governmental agencies (national, state, local) and the planning needs of educational systems and institutions.

2. Much of the statistical information collected is relatively unimportant for policy and planning purposes, reflecting the lack of systematic correlation between user needs and data-collection programs.

3. The data-processing capabilities of NCES are grossly inadequate, partly due to personnel shortages whose effects have been exacerbated by the mounting volume of service functions performed for USOE program offices and other federal agencies.

4. The NCES has little analytical capability—due to the lack of resources—and hence its effectiveness in meeting the policy needs of public and private agencies is greatly impaired.

5. The inordinate delays in the publication or other dissemination of statistical information greatly reduce its utility for policy and planning purposes. Although an effort is being initiated to provide on-line access to its computer tape files, NCES lacks the resources to *make this service fully effective and to* function satisfactorily as a national reference center for educational statistics.

The USOE has not been insensitive to the inadequacies of its statistical program. Indeed, the programmatic documents of NCES (such as the plans for the Common Core of Data for the Seventies) and the USOE budget requests for NCES in recent years have reflected serious efforts to overcome the agency's statistical limitations. Unfortunately, these requests have largely gone unheeded—as the figures in the following table, derived from the President's budget for FY 1975, clearly indicate:

[Dollars in millions]

Statistical programs by subject areas	1973 actual	1974 estimate	1975 estimate	Percentage change 1973–74	Percentage change 1974–75
Labor statistics	$57.1	$64.8	$69.7	13.5	7.6
Prices and price indexes	12.5	13.8	16.6	10.4	20.3
Production and distribution statistics	64.7	70.9	90.3	9.6	27.4
Construction and housing statistics	11.4	13.8	15.5	21.1	12.3
National economic and business financial accounts	21.5	26.7	28.7	24.2	7.5
Subtotal for economic statistics	167.2	190.0	220.8	13.6	16.2
Health-related statistics	72.4	81.4	83.9	12.4	3.1
Population statistics	11.4	6.7	7.4	−41.2	10.4
Educational statistics	15.2	16.2	15.4	6.6	−4.9
Criminal justice statistics	18.6	21.3	23.4	14.5	9.9
Social security and welfare statistics	12.2	18.7	21.2	53.3	13.4
Environmental statistics	20.3	19.4	20.3	−4.4	4.6
Subtotal for demographic and social statistics	150.1	163.7	171.6	9.1	4.8
Total, principal current programs	317.3	353.7	392.4	11.5	10.9

These figures are taken from *Special Analysis F*, a document prepared by the Office of Management and Budget which summarizes the support for the principal federal statistical programs for FY 1975 (with comparable figures for 1973 and 1974). It seems indefensible that a decrease of 4.9 percent in funds for educational statistics should be proposed for FY 1975, when for all federal statistical agencies combined an increase of 10.9 percent is projected. The situation of NCES is aggravated further by the fact that no increase under this budget seems likely in the number of staff positions for NCES—a figure that has remained virtually fixed in the face of a mounting workload.

A striking measure of the inadequacy of the budgetary support for educational statistics is provided by a comparison on education's figures in OMB's *Special Analysis F* with those for the health fields. The total projected for health-related statistics in FY 75 ($83.9 million), for example, is more than five times the amount proposed for educational statistics ($15.4 million). Yet education's share of the GNP is substantially the same as that for health fields (about 8 percent). ACE does not necessarily argue for funding parity between the federal statistical programs of these two fields, but it seems reasonable to maintain that the support for educational statistics must be greatly increased if even a minimally satisfactory information base is to be available for public-policy purposes.

As already noted, NCES has been forced to assume an increasing load of service obligations to USOE and to other federal agencies, whereas the purchasing power of its appropriations has been declining due to inflation. For example, the program sections of USOE have looked to NCES for all of the formula-grant calculations required by the proliferation of federal programs in education. Yet little recognition of this increased load has been reflected in NCES' budget, especially its manpower allocations. The agency's normal activities have necessarily suffered from this overload—so much so, in fact, that it has been forced to relinquish important data-collection programs to agencies outside USOE. For example, the ELSEGIS (elementary-secondary) finance survey has gone to the Bureau of the Census because NCES couldn't meet the required deadlines for lack of editing staff. The Equal Employment Opportunity Commission likewise has taken over two survey of educational personnel: that for elementary-secondary education and the forthcoming EEO-6 survey covering higher education. Yet EEOC does not have the required expertise for conducting a federal statistical program; and it is questionable whether or not the data collected under these programs will meet the educational policy and planning needs of the federal government and the education community.

Such considerations clearly indicate that the time has come for decisive federal action to improve the national system of statistical information in the field of education. The remainder of this statement will be devoted to an evaluation of two bills, one in the House of Representatives and one in the Senate, designed to achieve this goal (H.R. 13991 and S. 1539).

The Creation of a Separate Statistical Agency Within the Education Division of DHEW (S. 1539)

S. 1539 proposes the creation of a "National Center for Educational Statistics" within the Education Division of DHEW, whose director would report to the Assistant Secretary for Education and whose general policies would be established by a "National Board for Educational Statistics." The Assistant Secretary would serve as the non-voting presiding officer of the Board, whose membership would consist of six individuals appointed by the President and ten ex officio members. The bill would also modify the General Education Provisions Act to reflect the new composition of the Education Division, transfer responsibilities from the Office of Education to the new NCES, require NCES to conduct a massive and costly survey of school-age children, and authorize the appropriation of $20 million per year for NCES grants and contracts.

The proposed organizational changes presumably reflect the strong feeling of the bill's sponsors that NCES' situation has become so bad, and the likelihood of effective improvement from within so remote, that the establishment of a new agency independent of USOE seems to offer the greatest promise of fundamental improvement. A case certainly can be made for such a change, supported by examples of similar organizational arrangements for the Bureau of the Census and the National Center for Health Statistics. In each of these cases, the head of the agency reports directly to an assistant secretary. (In an apparently even more "favorable" organizational situation, the Bureau of Labor Statistics is headed by a Commissioner who reports directly to the Secretary of Labor, thus being equivalent to an assistant secretary.)

This approach probably would overcome some of the difficulties NCES suffers in its present organizational situation and relationships. For example, it would be able to gain a direct hearing at a higher administrative level for its program and budget requests. It would also have greater flexibility in organizing its internal administrative arrangements and greater influence over the totality of national statistical operations related to education.

Despite these likely advantages—and others that could be predicted—the American Council on Education believes it would be a mistake to enact S. 1539 at this time. In the absence of a systematic analysis of the problems and funding needs of NCES, and wtihout careful consideration of numerous adverse consequences of implementing S. 1539, ACE fears that this essentially unplanned reorganization would have several disadvantages:

1. At present, NCES relies on USOE to provide a variety of supporting services, including administrative and financial management, legislative relationships, and data processing. As a separate organization, NCES would have to develop its own staff and other resources to meet these needs; and these requirements would compete with those of the statistical programs as such. Particularly critical would be the additional manpower required, and there can be no assurance that new positions would be allotted commensurate with the expanded responsibilities.

2. The program offices of USOE are at present the principal federal "customers" of NCES, and their statistical needs are likely to grow—suggesting the

desirability of even closer coordination with NCES' activities. But it seems highly likely that the separation of the two agencies proposed in S. 1539 would impair their working relationships to a very substantial degree. The program offices already collect large bodies of statistical data needed specifically for program administration, and the separation proposed in S. 1539 would probably cause them to expand greatly their data-collection activities (including duplication of NCES survey data). Thus the fragmentation of the federal statistical effort in education would be aggravated, institutions and school systems would be more likely to receive duplicating requests for information, and the overall cost-effectiveness of the national statistical effort in education would decline.

3. The level of budgetary support projected in S. 1539 ($20 million per year) would be far too low to (a) offset the extra costs of maintaining a separate organization, (b) overcome the deficiencies in the existing system, and (c) meet the additional costs of the new activities mandated by the bill.

The Council believes that a preferable organizational alternative would be to upgrade NCES within USOE, rather than to create a separate agency. For example, changing the title "Assistant Commisioner for Educational Statistics" to "Deputy Commissioner for Educational Statistics" would improve the status of NCES relative to the program and budgetary decisions of USOE. This possibility should be included among the options considered in the study contemplated under H.R. 13991.

H.R. 13991: Limitations and Potentialities

The Council prefers the approach of H.R. 13991 to that of S. 1539, primarily because the former proposes no *a priori* substantive changes regarding educational statistics, but instead would mandate the Secretary of Health, Education, and Welfare to report to the Congress on the "feasibility of performing" a comprehensive program of statistical functions (including recommendations for the administration of such a program). As H.R. 13991 now reads, however, it would not necessarily lead to improvement in the federal statistical-information system. The language of the bill is so general regarding the aegis under which the study would be conducted, the scope of the investigation, and the outcome expected that the overall result could turn merely into another in a long series of frustrating efforts to create the kind of statistical program the federal government needs for education. The Council strongly urges, therefore, that H.R. 13991 either be amended or the terms of reference in the Subcommittee's accompanying report be otherwise so clearly articulated as to guarantee that the Congress will receive a document that can serve as a basic charter under which a statistical agency of top rank can be organized and funded. More specifically, we recommend that the directive to the Secretary of DHEW include the following conditions:

1. That the Assistant Secretary for Education establish an independent task force to conduct the study, with a director preferably recruited from outside the federal government. He should report directly to the Assistant Secretary. And enough funds should be provided for the employment of a well-qualified professional staff—of adequate size and for a period of time sufficient to permit the completion of a definitive investigation.
2. That in order to assure broad participation in the general planning and oversight for the study, a special advisory committee be established consisting of non-federal representaitves as well as representatives from the major federal users of educational statistics.
3. That the study include a detailed program and budgetary review of the history of NCES since its establishment in 1965, with a view to determining the nature and causes of the inadequacies that have been identified in the reports cited above.
4. That a comprehensive long-range plan for the improvement of the national statistical system for education be developed with detailed specifications of the resources required to implement the plan (in concrete "program-budget" terms).
5. That the study consider the present organizational situation of NCES, including its relationships to other agencies collecting educational statistics, and propose arrangements that seem desirable for the effective implementation of the plan.

It should be recognized that this kind of investigation would require a substantial commitment of effort and resources on the part of DHEW. The Congress should not expect a productive outcome from this study unless this kind of commitment can be made. And as a token of congressional support, it is strongly recommended that authorization of the necessary funding be included in H.R. 13991.

ASSOCIATION OF RESEARCH LIBRARIES,
Washington, D.C., June 10, 1974.

Hon. CARL D. PERKINS,
U.S. House of Representatives,
Rayburn House Office Building,
Washington, D.C.

DEAR CONGRESSMAN PERKINS: In response to your recent request for our views on H.R. 13991, we have prepared the statement attached which we would like inserted in the hearing record.

We continue to be grateful to you for your good efforts to strengthen the library and education programs of this country. We have all been frustrated and indeed, seriously hampered by the lack of adequate statistical data, and are most appreciative of your bill which will direct national attention to this problem.

Sincerely yours,

STEPHEN A. MCCARTHY,
Executive Director.

Attachment:

A STATEMENT ON H.R. 13991: A BILL REQUIRING THE DEPARTMENT OF HEALTH, EDUCATION AND WELFARE TO CONDUCT A STUDY OF THE COLLECTION AND DISSEMINATION OF EDUCATIONAL STATISTICS

The Association of Research Libraries appreciates this opportunity to express our views on H.R. 13991, which would require the Department of Health, Education, and Welfare to conduct a study of the collection and dissemination of educational statistics. As the principal organization of the 93 largest research libraries in the United States and Canada, the Association of Research Libraries is vitally concerned with the condition of educaton in the United States and thinks the resolution is most desirable. Accurate statistical information is basic to the planning of sound educational programs. A national system for the collection of statistics is essential to insure comprehensive and comparable statistics which can be used at all levels of education.

The present practices for the collection and dissemination of educational statistics are most inadequate. Insufficient funding, manpower and planning over a period of years has resulted in the highly unsatisfactory situation in which we find ourselves today, and the proposed assessment is the necessary first step in planning a new program.

The establishment of a separate federal agency for educational statistics, as proposed by S. 1539 may be an important step in insuring that we have accurate, current, and readily accessible educational statistics. Before making the decision to create a new agency, however, the assessment called for in H.R. 13991 is essential, we feel, and can provide the basis for this and other decisions regarding needed changes in the current program. Thus, we prefer the approach suggested in H.R. 13991, rather than that of S. 1539. Should the assessment indicate that a major organizational change is required, we would support such a change.

To insure that the study is planned and conducted so as to adequately address the concerns of all interested parties, and to draw upon the considerable expertise of individuals in non-federal agencies, we feel it is essential that there is input and participation by a number of people, including the users as well as suppliers of educational statistics. An advisory board made up of such individuals should play a major role in the study.

Finally, we recognize that the collection and analysis of statistics is an extremely complex task requiring careful planning, input from all constituencies, a trained staff and a significant level of funding. If we are not prepared to provide adequately for these elements, analysis of existing, as well as needed programs, will simply be an elaborate and futile exercise. We pledge our full support to insure that this will not be the case, and urge that in the charge to the Secretary of Health, Education and Welfare, specifications providing for these elements be clearly stated.

MIDWESTERN COLLEGES OFFICE,
Washington, D.C., June 13, 1974.

Hon. CARL D. PERKINS,
U.S. House of Representatives, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington, D.C.

DEAR CONGRESSMAN PERKINS: This office has compiled from member colleges a response to your letter of May 7, 1974 asking our views on the collection and dissemination of educational statistics. We appreciate very much the opportunity to relay these opinions to you.

(1) What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards the Federal role?

The responding colleges appear to be unanimous in their feeling that the Federal data collection procedures have improved over the past five years but still fall far short of providing what is needed. One correspondent said he didn't have much to complain about because he didn't expect much. One felt the present means of organizing material was not up to date with the present "state of the art." A number mentioned that the findings are outdated and worthless for planning purposes. "They are really useful only as historical references."

Several responses also pointed out that the multiple requests for data—all with different formats—to colleges doubtlessly produce inaccurate listing of information by the responding colleges. The problem of time involved in preparation of such data in various forms appears to be especially acute at smaller colleges. Two letters from different states pointed out that one state has a system which is incompatible with national data systems and the other lacks the expertise to guide on "radically different" definitions for data requested.

(2) How can this situation be improved?

Suggestions for improving the current situation included

(a) changing key personnel and budget allocations at NCES or creating a new agency;

(b) providing the central filing system described in H.R. 13991;

(c) publishing some collected data in periodical form to provide current information for institutional planning;

(d) offering Federal grants to colleges to set up information systems allowing retrieval of data in the form requested by the Federal government.

Another correspondent specifically cites his impatience with pleas of poverty from colleges and universities stating that "With better data, institutions and policy makers will make more functionally sound decisions."

(3) What opinion, if any, do you have on the provisions contained in S. 1539 creating a new Federal agency for educational statistics?

The proposed new agency in S. 1539 may improve the situation. One correspondent referred to the section in the proposed legislation which calls upon the new Center to assist state and local educational agencies, improving and automating their statistical collection activities and he emphasized *improving*. Two had minor reservations: one feared that the U.S. Office of Education would continue to collect its own data even if the new NCES were established and hoped this could be prevented; another was concerned about the confidentiality of individual colleges' data and hoped that an institution's permission to use identifiable data will be sought.

All our correspondents are gratified that you are aware of the problems and pitfalls of the present situation in gathering and disseminating educational statistics. One correspondent summarized his views this way: "We can't understand the reluctance of some institutions to be open about their operations and we are eager to cooperate in this new plan."

Again, thank you for inviting the Associated Colleges of the Midwest and the Great Lakes Colleges Association to share our views with you.

Sincerely,

IDA WALLACE, *Director.*

QUOTATIONS FROM RESPONSES TO MIDWESTERN COLLEGES OFFICE MEMORANDUM NUMBER 154, LEGISLATION TO IMPROVE THE COLLECTION AND DISSEMINATION OF EDUCATIONAL STATISTICS, H.R. 13991

(1) What is your view on the present state of the collection and dissemination of educational statistics in the country, especially as regards the Federal role?

(a) "The first response has to do with the lack of timeliness of the national statistics. By the time they are collected and disseminated they are already outdated and practically worthless with respect to planning purposes. They are really useful only as historical references. Unless a new agency can drastically reduce the interim between the collection and the dissemination of the data the expenditure involved in the creation of that agency is probably wasted."

(b) "It is my impression that the National Center for Educational Statistics, while having been responsive to criticism and attempting to improve data quality and speed of delivery, still falls short of what would be expected from the primary Federal educational statistics agency."

(c) "I don't find a great deal to complain about regarding the federal level of educational statistics collection, perhaps because I don't expect a great deal from them. I think that it has improved somewhat recently with the institution of the practice of advance circulation of forms that will be required in the fall. This allows institutions to anticipate the needs for particular information."

(d) "The same data are requested by Federal and other agencies each year in a variety of formats. The fact that there is little standardization of collection and reporting techniques continues to plague administrative staffs of colleges and universities." . . .

"It has been nearly impossible to use most of the Federal publications of educational statistics during the past three or four years as planning documents because they are so outdated by the time you see them."

(e) "The biggest problems for the collection of data are (1) the amount of lag time between the time the data are collected by the Federal agency and the time by which the materials are ready for publication, and (2) the number of multiple requests which colleges receive from various agencies, both governmental and private, for the same information in different forms. With regard to the first I have the impression that the information collection is simply inefficient and that the means of organizing the material are not up to date with the current "state of the art" in data banks. Part of the problem is apparently the inaccurate listing of information by the responding colleges. This then is connected to the second problem, namely that schools receive too many requests in order to do a good job in filling out the data required.

"A large university can afford to have a single office take care of all the requests received. But requests of a small private school are not smaller in proportion to the size of the operation."

(2) How can this situation be improved?

(a) "Improvement might result from one of two actions: changes in key personnel and budget allocations at NCES or creation of a new agency."

(b) "Given the heterogeneous nature of higher education in the United States, it is very difficult to use much of the aggregated data disseminated from Washington. This problem is not necessarily insurmountable, however, and the new agency might achieve positive results in the area of making the data 'usable'."

(c) "I believe the 'clearing house' idea is a good one. A reporting system should be designed which can be altered slightly each year when necessary, but used long enough so that some efficient collection system on the campuses can be designed to interface with it. I have no idea as to how speed can become integral to the Washington bureauracy, but perhaps publishing some collated data in periodical form would help make comparative information more current and useful for planning, rather than simply historical fact."

(d) "I think that a critical part of the proposed legislation is that section which calls upon the new center to assist state and local educational agencies and improving and automating their statistical collection activities. I would emphasize the *improving* and hope that the funds could be made available and sanctions developed to require that the state collection agency, particularly if it is collecting HEGIS information, be required to obtain a thorough understanding of the statistical definitions desired in the HEGIS data and maintain close contacts with the institutional reporting officers."

(e) "I would say that the key to the whole problem may be obtaining the cooperation of the individual colleges which are providing the information. You might toss out the idea that schools could apply for grants which would furnish them the opportunity to set up an information system allowing the retrieval of data in the form requested by the Federal Government. Receipt of such a grant would commit the participating institution to submitting data for a certain number of years. The other attack on this level of the problem would be to have the information presented in such a way that institutions would not be bothered repeatedly for the same information but in different format. I see two approaches here: (1) the Federal government could request the information from the institutions in a sufficiently disaggregated form that the numbers could be aggregated for whatever uses other bodies wished (this assumes that other bodies would have access to the Federal data bank) or (2) come up with a uniform information system at the Federal level to which all agencies, collecting and producing, would adhere."

(f) "We believe that with better data institutions policymakers will make more functionally sound decisions . . .

"Some of you—not necessarily in person, but people in your positions—have from time to time deplored the fact that such documentation costs money and that you do not have the funds . . .

"Allow me a certain impatience if this is your point of view. I do not believe that the solution simply is to let you have more money. Your customers and your funders are entitled to be assured that you know how your business functions, that you know the answers to the questions they ask, and that you yourselves understand fully where the strengths and weaknesses of your institutions lie."

(g) "We can't understand the reluctance of some institutions to be open about their operations and we are eager to cooperate in the new plan."

(3) What opinion, if any, do you have on the provisions contained in S. 1539 creating a new Federal agency for educational statistics?

(a) "H.R. 13991 seems to address several of the problems which I have experienced. It certainly represents a step in the right direction. My concern has to do with Paragraph 6 and the making very public of information which has remained relatively confidential in the past. I believe that nothing should be divulged to any party or agency from such a file without the expressed approval of an institutional representative."

(b) "Perhaps the creation of an 'independent' agency, like that proposed in S. 1539, is the answer. My primary concern with this approach is that it seems likely that the Office of Education would continue to collect its own data in addition to those collected by the new NCES. If this can be prevented, I think the Senate proposal may be a viable solution to the current problem."

COUNCIL FOR EDUCATIONAL DEVELOPMENT AND RESEARCH, INC.,
Washington, D.C., June 10, 1974.

Hon. CARL D. PERKINS,
House of Representatives, General Subcommittee on Education,
Rayburn House Office Building,
Washington, D.C.

DEAR CONGRESSMAN PERKINS: Thank you for the opportunity to examine HR 13991, a bill requiring the Department of Health, Education, and Welfare to conduct a study on the best means to improve the collection and dissemination of educational statistics.

Although the potential uses and problems of obtaining educational statistics are expensive, they do not seem to warrant the creation of a new Federal agency. Such an effort should consider carefully the scope of present agencies and the Federal programs already in progress.

I appreciate your involvement of CEDaR in the consideration of this bill. Your initiation of such legislation to evaluate the effectiveness of Federal efforts contributes greatly to the improvement of American education.

Sincerely yours,

E. JOSEPH SCHNEIDER,
Executive Secretary.

GUIDANCE ASSOCIATES OF PLEASANTVILLE, N.Y.,
June 11, 1974.

Hon. CARL D. PERKINS,
Congress of the United States, House of Representatives, Committee on Education and Labor, General Subcommittee on Education, Rayburn House Office Building, Washington D.C.

DEAR SIR: This is in reply to your letter of May 7, 1974 in which you request an opinion and recommendations regarding H.R. 13991.

As a publisher of educational audio-visual materials, Guidance Associates faces many problems which could be at least partially alleviated by better sources of educational statistics, and information. I thank you for this opportunity to make a few comments on these problems.

Your first question asks for an opinion on ". . . the present state of the collection and dissemination of educational statistics. . . ." Time between collection and dissemination is a most important factor. Presently the delay between collection and dissemination of educational information is too long. Too often this delay has caused Office of Education studies to be of only academic interest rather than useful. The development of educational materials is difficult, expensive, and a risky process. Publishers are always in need of up-to-date information on educators' requirements and even opinions in order that products may be developed which will enable each teacher to find materials that most closely match his or her teaching technique.

Some of this delay in information dissemination could be alleviated by establishing information priorities. It should not be very difficult to determine which types of data are most affected in value by the passage of time. Then that material could be collected by a very simple collection instrument, evaluated by special teams and disseminated on a priority basis in format that would be appropriate for the information and potential user. An example of an operation where time, speed of dissemination and delivery format could be important: Each year there are numerous school closings, openings, and district consolidations. U.S.O.E. publications of school addresses have been helpful, but due to delay, inaccurate. Perhaps U.S.O.E. could consider making that information available on computer tape at least twice yearly. Simply finding the customer is not as exciting as developing a new method of teaching reading or math, but is necessary. In fact, it is absolutely necessary.

Dissemination of educational statistics and information could be made more efficient. Probably much valuable information has been simply overlooked. Few educational publishers have Washington representatives who can continually monitor publications from the National Center for Educational Statistics. Perhaps notices of new publications could be transmitted to publishers through appropriate associations such as the National Audio-Visual Association. Something similar to the *Publishers Alert Service* might attract the attention of individuals who could use the information. *Publishers Alert Service* is an information system developed by U.S.O.E. to inform publishers of educational materials that have been developed under government grants.

Your letter asks for an opinion on the provision in the Senate version of the Elementary and Secondary Education Extension Act which would create a new federal agency for educational statistics. This is a management question. If it is necessary to start a new federal agency in order to make activities of an existing bureau more efficient and more responsive to the needs of legislators, the public, and the federal government then it should happen. However, the creation of a new address for educational statistics will not do much for efficiency unless those involved find that their mandate is more easily carried out under those circumstances.

Sincerely Yours,

DONALD R. TAYLOR,
Director, Washington Office.

CONGRESS OF THE UNITED STATES,
HOUSE OF REPRESENTATIVES,
Washington, D.C., June 6, 1974.

Hon. CARL PERKINS,
Chairman, Education and Labor Committee,
Rayburn House Office Building,
Washington, D.C.

DEAR MR. CHAIRMAN: In regard to my continued concern over the extension of the Department of Education's requests for statistics, I am enclosing a copy of a letter relating to the problems of one institution of higher education in my district in meeting the demand for statistics in one area only.

It is clear that the Government's demands for statistics and reporting is an unjust burden on the education institutions. I once again must urge you to hold hearings on these matters and to particularly look into the possibilities of consolidating forms, reporting and requirements. I would particularly urge you to investigate the use of these statistics by the various agencies as well.

Sincerely,

MARIO BIAGGI, M.C.

FORDHAM UNIVERSITY,
Bronx, N.Y., May 20, 1974.

Hon. MARIO BIAGGI,
Congress of the United States,
House of Representatives,
Washington, D.C.

DEAR CONGRESSMAN BIAGGI: I enclose a copy of a letter which I sent recently to the Director of Research, Equal Employment Opportunity Commission.

I want to alert you to the kinds of problems that are being generated for universities by people in some Washington bureaucracies.

Anything you can do to control this development would be appreciated.

With best wishes, I remain

Sincerely,

JAMES C. FINLAY, S.J.

FORDHAM UNIVERSITY,
Bronx, N.Y., May 23, 1974.

Director of Research,
Equal Employment Opportunity Commission,
Washington, D.C.

DEAR SIR: We wish to submit, for the consideration of the Commission, some serious difficulties which Fordham University—and presumably most universities—would have in attempting to comply with the proposed recordkeeping and reporting requirements of the Higher Education Staff Information Report EEO-6, which were announced in the *Federal Register*, Vol. 39, No. 89, Tuesday, May 7, 1974.

1. First of all, these requirements should be considered in the context of new instructions from the Office for Civil Rights regarding greatly expanded reporting requirements for the Compliance Report, Student Enrollment Survey, sent in March 1974. Three new components have been added to the former Compliance Report forms: information on the basis of sex as well as race; separate reports for each major field of study, instead of for each constituent unit; and identfication of community/junior college transfers. Furthermore, separate reports for each major field of study in each separate constituent unit or branch campus must be prepared. Finally, a summary report for each location also must be prepared. In Fall 1972, Fordham submitted 12 separate report forms; in Fall 1974, we would be required to submit 21 much more detailed report forms. This Compliance Report is due on December 15. The proposed EEO-6 report would be due on November 30. Between August 15 and December 15 New York State institutions already are obliged to submit 12 other official reports (some of which are duplicates of reports to NCES), besides reports to other agencies such as the Middle States Association of Colleges and Secondary Schools, American Council on Education, and others. We estimate that after we make provision for assembling the additional items required for EEO-6, the time and effort required to complete this form would be at least trebled.

2. We do appreciate the substitution of one common form to satisfy the requirements of the several agencies, EEOC, OFCC, OCR, and NCES.

3. We strongly object to the requirements for retaining for a period of two years all written *applications* for a position. Many of these applications are useless for the purposes intended. Thus, they rarely indicate the race of the applicant, and often enough the sex cannot be identified. A large proportion obviously do not meet the published qualifications, so that there is no point in following them up with further inquiries. Let us take two examples. Last year we had an opening for the position of dean in one of our major schools. We advertised the opening widely. The number of applications was 131. The original applications and the supporting documents sent to the search committee occupy seven and one-half inches of filing-drawer space for this one dean's position. Another example: one academic department of one faculty had three positions open up this year. For these three positions a total of 150 applications was received.

Our suggestion is that application materials be retained only for the group finally selected for decision, after the screening process has been completed. Usually this number will be fewer than ten.

4. The data-items are much too detailed, too finely drawn; for example, the breakdown in each occupational activity by salary intervals, by race, and by

sex. To compile this amount of information into an official report annually is a very heavy task and is an unreasonable demand. It is difficult enough to do periodically in preparing or revising an affirmative action program. Such minute analysis should be expected only when a desk audit or an on-site audit is appropriate.

To descend to minutiae—which the requirements do—let us ask if it is reasonable to expect some sixty or seventy supervisors to make, by "visual survey," fine distinctions like those between Malayans and Thais on the one hand, and Orientals, like Koreans and those of Polynesian origins, on the other.

5. If such extensive changes in record-keeping and reporting must be made, we suggest that the new requirements should be postponed to the academic year 1975–76, to give institutions an opportunity for tooling up.

We appreciate the opportunity to offer these suggestions before the imposition of new requirements.

Sincerely,

JAMES C. FINLAY, S.J.

ASSOCIATION OF JESUIT COLLEGES & UNIVERSITIES,
Washington, D.C., June 13, 1974.

Hon. CARL D. PERKINS,
Chairman, Committee on Education and Labor,
Rayburn House Office Building,
Washington, D.C.

DEAR MR. PERKINS: Thank you for inviting my comments on the issue of an independent agency for data collection and dissemination proposed by S. 1539, and upon your own keen interest in the matter. I shall respond as best I can to your request. I am including a special enclosure in reply to Question 1, while providing additional responses and reactions to your other questions below.

With respect to Question 3, on the proposed creation of a new Federal agency for educational statistics, let me observe that the present National Center for Educational Statistics (NCES) is performing a useful service within the limitations of staff and funds. Those limitations, however, prevent it both from doing an adequate job and from meeting essential internal and external needs. With particular reference to higher education, the functions of NCES should be subject to better planning and coordination, improved funding and increased staff to meet real data needs for setting national policy. To assure better planning for selecting targets for effective data collection requires close coordination with congressional needs, HEW and OE resources and the ability and efficiency of the education community to provide appropriate and timely data.

It would seem to me that a quasi-independent agency with its own Board establishing policy could be a most adequate veihcle to achieve proper objectives, provided that Congress clearly defines its mission and supports it fully. I add these observations about the proposal in S. 1539:

(a) It might be useful to specify Board membership: certain "experts" in particular substantive areas of education (elementary-secondary, vocational-technical, adult, etc.) should be mandated. While the Commissioner of Education has the resources of his staff in these areas, more independent members would prove helpful. (Section 414(c)(1)(A).)

(b) Some thought should be given to Section 414(b)(3), "to assist state and local educational agencies in improving their statistical and data collection activities," by possibly including a few specialized research institutes and independent agencies.

(c) Care should be taken to assure prompt and adequate dissemination of data and studies. In this light I would like to add the concluding paragraph of his comments by Lyman Glenny on the National Commision on The Financing of Post-secondary Education Report bearing on possible public deception:

"10. The earlier drafts of the Commission report kept open the question of where the Information Center would be located—in or out of the government. The final report does not mention the several options listed in the early drafts, but says that, 'It is not important that this center be public or private, a new agency or one that exists now.' *The Chronical of Higher Education* reports that the OE has already made a contract with the Rand subsidiary in Santa Monica to carry out certain undefined duties. What are they? Is this in itself not a policy issue which should have discussion and public determination? It may be that the contract is only temporary and that the issues will be public, but the report does not say so. I believe that the nature, location and powers of the center would be of considerable interest to SHEEO (state coordinator) members, as well as institutional leaders."

In addition to the issue raised by Glenny, I should note that the Office of Education withheld information useful to Congress and the public at the time of the debate over the Higher Education Amendments of 1972. This was a study of the impact of the Educational Opportunity Grant program contracted for by the Office of Education through Columbia University's Bureau of Applied Research, since made available in a limited way.

In line with what has been said about a proposed agency and relying upon the comments below on Question 1, Question 2—on improving the current situation—has largely been answered. The federal role should be aimed at collecting useful data, particularly for the purpose of assisting development of sound national policy for education, including students and institutions. It should stimulate accurate reporting and consistent data from state agencies and other reporting organizations. Perhaps the use of State Planning Commissions mandated by Congress would be an appropriate resource under the guidance of policy directives.

To overcome one major handicap today, any statistical agency should stimulate the generation of analyses from various sources. The paucity of data for amending the Higher Education Act of 1968 was apalling. Data and analyses from other sources suffered from interest group prejudices. Yet, while such independent sources cannot be expected to produce objective studies, the efforts of the Carnegie Commission, the College Entrance Examination Board, Brookings Institution, to name but a few, are necessary for an adequate picture of current conditions. It should be the goal of a quasi-independent agency to draw upon those analyses, and collate their results with national policies set separately by its own Board of Directors. This would go a long way towards providing the means for the political process to function effectively in making decisions for all of education.

Before concluding, I should add a note on two questions to which I find no data available for answers. These questions relate to problems about which higher education is aware, and on which policy decisions must be made by Congress:

(1) Why are so many compensatory education programs necessary at the postsecondary level relative to the tax subsidies for elementary-secondary education from local, state and federal funds?

(2) What is the statistical correlation between the family income of students entering college and federal and/or state aid received, with those same students exiting from postsecondary education in terms of debt burden or subsidy each income class obtains?

I hope these remarks serve your purposes for dealing with the issue of data collection and dissemination and the role of the Federal government. Again, thank you for the opportunity to comment on it.

Respectfully,

JOSEPH P. KANE,
Associate Director.

Enclosure:

Response to Question No. 1: Present State of Data Collection . . .

The state of educational statistics in the United States is rather deplorable. Given the size and complexity of the education sector, the total effort made in collecting, disseminating, and utilizing of data on education by the federal government seems meager as compared with other industrialized countries. This observation could be easily documented by comparing any of the measures by which one could assess the magnitude of resources employed for this purpose.

In terms of the mandate provided to the United States Office of Education through past legislation, it can be stated that the present activities in educaional statistics fall far short of the goal of "charting the progress and development in education in the country." In the first place, there are major areas of education for which no data is currently being assembled. Secondly, USOE's major programs of educational statistics are, in most cases, totally inadequate in terms of their coverage, timeliness and policy relevance.

While the major reason for this negative evaluation of the current state of educational statistics can be attributed to limited resources, it is also possible that even with the given resources the current set of priorities of the USOE's educational data collection effort is in need of justification. In particular, in a number of substantive areas, no attempt has hitherto been made to match either the Congressional needs for information in order for that body to carry out its legislative function with adequate information, nor does there seem to be any effort to match the data collection to the needs of the administration of the various Office of Education programs and their evaluation.

While the emphasis of the above statements might be disputed, there should be general agreement on the foregoing statements on the inadequacy of the activities in educational statistics in the country and particularly of the federal role in this effort. Before substantiating the points which lead to this conclusion, it may be useful to point out that there has been no major legislative initiative that would create a strong and sound long term strategy for the federal role in educational statistics. The National Center for Educational Statistics not only suffers from the lack of resources but is literally buried in the federal educational bureaucracy with little opportunity for exercising initiative and innovation in its data collection efforts. Whether this problem could be rectified by the creation of a new federal agency for educational statistics is problematic, but the effort is necessary. It is, however, important to note at the outset that the current organization of education statistics at the federal level hardly seems conducive to satisfying the wide range of needs for federal statistics. This also suggests that marginal improvements may not be satisfactory in alleviating the serious gaps between data requirements and the current availability in the educational sector.

* * * * * * *

Illustrations of the present inadequacy in the collection and dissemination of educational statistics by the USOE.

(A) Student Finance Data on Post-Secondary Education

There is no major national sample survey conducted by the NCES or any other federal office which will provide information on how students finance their education at the post-secondary level. One major data source for this information is the Student Resource Survey so far completed in four states by the College Entrance Examination Board in cooperation with the state higher education authorities. There has been no direct participation by the federal government in the design of these surveys or in the identification of the information needed at the federal level.

This situation contrasts sharply with every other industrial country which regularly compiles data on student finances in post-secondary education. The severity of the problem can be better appreciated if one realizes that a large scale federal problem such as Basic Opportunity Grants program was initiated and is being implemented without any reasonable statistical estimate of the target population and its characteristics. The only national sample providing any information on the socio-economic characteristics of the student population is that provided by the U.S. Bureau of Census through its current population survey which is based on a 1% sample of the entire population of the country. Consequently the sample size of the post-secondary student body canvassed by the survey is approximately 7,000 out of a population of 9 million. Thus, any attempt to disaggregate the data either geographically or by population subgroups often leads to inadmissably high sampling error.

(B) Adult Education

With the changing composition of the population we have faced absolute decline in elementary and secondary education and the impending decline of the enrollment of youth in post-secondary education but with a possible rise in actual or potential participation of adults in education. This is a major phenomenon that is currently evolving and the information regarding which is totally inadequate. The social demand for education by the adult population, the availability of places in the formal and non-formal education systems, the costs and resources available for financing their education are currently matters of speculation and conjecture. It is unfortunate that none of the available educational statistics in the federal government provide information that would enable policy makers to grapple with the emerging problem of adult education.

(C) School Finance

In the area of school finance, even the gross and aggregate summary figures on the federal, state and local shares in financing elementary and secondary education and the methods of financing by each of these levels of government are not available in the USOE statistics. As a result, to even get a broad picture it becomes necessary for a person to obtain information from various sources and attempt to piece them together. The following information is extracted from a recent study on school finance; the information, which should be readily available from a single national source, was compiled from eight different sources and their relevant publications.

TABLE 1.—*1969–70 Percentage of funds allocated to public schools*

Local	52. 7
State	40. 7
Federal	6. 6
All levels	100. 0

1971–72 levels of government and source of revenue for public schools

Local total	54. 7
Property taxes	44. 9
Other taxes	. 9
Fees and charges	3. 7
Borrowing	5. 2
State total	38. 8
Sales taxes	18. 5
Income taxes	9. 6
Other taxes	5. 3
Miscellaneous, fees and other	5. 4
Federal total	6. 5
Personal income taxes	3. 9
Corporate income taxes	1. 3
Other	1. 2
All levels	100. 0

Source: Reischauer, Robert D. and Hartman, Robert W., "*Reforming School Finance*," Brookings Institution, 1973.

Apart from this aggregate data information on school district finances are compiled through Elementary-Secondary General Information Survey by the NCES but this Survey does not permit one to obtain any information on disparities in the financing of elementary and secondary school systems by states or to link the socio-economic characteristics of the school districts with revenues and expenditures in those districts. Thus an analysis of intra-district disparities can not be carried out satisfactorily through the available survey instruments. The consequence of this lack of information became apparent when the President's Commission on School Finance was forced to develop its own data base using a large number of sources particularly from different states.

(D) Special target populations of federal aid in education

To obtain a full fledged information system in a wide variety of target populations in education that are currently receiving aid or are eligible for aid under existing or proposed programs one may need a full fledged census of the pupils. For instance, an appreciation of the incidence of physically handicapped, such as hearing impairment, would need a complete count of the particular population together with data variables reflecting the particular characteristics of the individuals. Data collection effort of this scope and magnitude would no doubt impose an enormous burden on federal resources. Given the federal role in providing aid through state and local channels it may be sufficient to obtain indicators of incidence through sample surveys. Even this level of data collection effort is currently lacking, as a result policy formulation regarding say the handicapped is carried out almost in a vacuum.

STATE OF MINNESOTA,
DEPARTMENT OF EDUCATION,
St. Paul, Minn., June 10, 1974.

Hon. CARL D. PERKINS,
Chairman, General Committee on Education,
Committee on Education and Labor,
Rayburn Office Building,
Washington, D.C.

DEAR CHAIRMAN PERKINS: Thank you for asking me to comment on educational data collecting and dissemination activities of the Federal Government. Your comment that presently (it) is doing a poor job certainly does not overly denigrate the quality of the activity.

The problems, I believe, lies in a plethora of questionnaire perfectly designed to collect information for which local educational agencies have little use. The Common Care Program, a feasibility study for which is now underway, holds promise only if the number of questions can be reduced drastically.

A second problem arises from data items the justification for which has never been established. These items are often expressive and if data sources are established to produce meaningful information the cost in man hours for the state and local educational agency becomes extremely high.

Thirdly, turn-around time for data is extremely slow. If school districts participate as a data gathering activity courtesy demands that they should receive reports back in a reasonably short period of time. Reduction in the number of questions so that editing does not approach an insurmountable task would help to reduce the editing burden.

I would be opposed to the establishment of super agency for collecting educational statistics as suggested by the Senate Bill 1539. It would seem to me that establishing such a division in the federal education agency would only aggravate the data collecting problem of the LEA's and at the same time solve few problems.

HR 13991 proposes a major study by OE of its entire data collection. At present the Council of Chief State School Officers has a committee of data collecting persons who meet regularly with federal program officers and with NCES to help shape the gathering of educational statistics. If HR 13991 were to become law I would trust that the members of this committee would be asked to actively participate.

Sincerely,

CLYDE O. BEZANSON,
Assistant Administrator.

STATE UNIVERSITY OF NEW YORK,
Albany, N.Y., June 12, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education, Committee on Education and Labor, House of Representatives, Rayburn House Office Building,
Washington, D.C.

DEAR MR. PERKINS: Mr. William Claire, Director of the Washington office of the State University of New York, has asked me to respond on his behalf to your letter of May 7, 1974, regarding the hearing which your Subcommittee held on H.R. 13991 on May 7. Because I have had extensive involvement with the U.S. Office of Education's National Center for Educational Statistics (N.C.E.S) for nearly eight years, and because of my active role in H.E.G.I.S. conferences and Federal statistics committees of the Association for Institutional Research and the National Association of Colleges and Universities Business Officers, Mr Claire thought I might be able to provide some insight on the higher education statistical programs of the Federal government. My remarks will be limited at this time to postsecondary education.

It is widely believed, and I share that conviction, that educational statistics about higher education and its students are unavailable, overly delayed, inadequately disseminated, and to some extent unrelated to the pressing policy issues facing Federal decision makers and others concerned with the planning and support for postsecondary education. In my opinion, the situation is worsening while at the same time those with a need to know have become more vocal in their recognition of the inadequacies in the structure and approach to postsecondary education statistics. For example, in 1973 the "Newman Report" to the U.S. Commissioner of Education comprehensively described the current problems. The American Council on Education in February of 1973 produced an exceptional paper describing the sad state of higher education data. The Association for Institutional Research's Committee on Access to Federal Data has issued two reports on the same problem which were sent to various H.E.W. and U.S.O.E. executives and congressional staff members. The last two H.E.G.I.S. planning seminars have also been clear on this point. The 1967 Report of the Special Subcommittee on Education of the Committee on Education and Labor titled "Study of the U.S. Office of Education" contained on pages 758–763 a thorough analysis of the difficulties of the N.C.E.S. The 1963 *Report of the Advisory Panel on Educational Statistics* raised many of the basic questions which, nine years after the creation of the N.C.E.S., still remain very much in need of solution.

In our own area of higher education and postsecondary education statistics, we have been told by personnel of N.C.E.S. that the difficulties in providing accurate and timely summaries of institutional data are only slightly a function of the inability of respondents to provide the information, but are largely the result of priorities in N.C.E.S. and U.S.O.E., coupled with a somewhat variable style of management which makes continuous progress quite difficult.

Let us recognize from the onset that improving the situation will not be easy nor inexpensive in terms of dollars, personnel, and some sacrifice of the old but less effective approaches. For example, although the original authorization for the U.S. Office of Education was to provide educational statistics, that role has since been almost completely overshadowed by the program and mission role that has developed in the past two decades. No longer can the National Center for Educational Statistics be seen as a free agent in the development of high quality measures of the condition of education in the United States.

I realize that there are before both the Senate and House of Representatives bills which deal with this major problem in different ways. I would like first to talk about your own bill (H.R. 13991). I have conferred with a number of people in the higher education statistics field and have reached the general conclusion that the analysis of the problem and the request for proposed solutions to the problem of educational statistics is too important to be left solely to the Department of Health, Education, and Welfare. We have recalled the "Newman Report," the 1963 Advisory Committee Report referred to above, your 1967 Special Subcommittee's report, the many communications from higher education organizations and individuals to a series of commissioners of education and to various key personnel in the N.C.E.S., and numerous H.E.G.I.S. planning seminars as ample evidence that the problems have been discussed and their solutions proposed time and again, but that so long as only the U.S. Office of Education or the Department of Health, Education, and Welfare are involved, little substantial progress can be expected. Therefore, I would propose that such an analysis as your bill requires be conducted by the Statistical Policy Division, Office of Management and Budget, in the way proposed by the President's Commission on Federal statistics in its 1971 report (Volume I, pages 3–4). In the same document one can find an outline for a statistical audit of Federal agencies which, with minor modifications, might lead to a more independent and thorough analysis of the current statistical capability of the U.S. Office of Education.

I believe that the one-year period for the evaluation required by H.R. 13991 would lessen the scope that could be covered and the comprehensiveness of recommendations flowing from the analysis. I would, therefore, prefer that the O.M.B. statistical audit be conducted over a 15- or 18-month period to allow for representatives of the educational field to be consulted more completely and increase their consensus on the recommendations.

The other major lgeislation proposed is S. 1539 which would create a new Federal agency for educational statistics. In a conversation with Senator Pell, I learned that it was not so much his intention to create another National Center for Educational Statistics in competition with a similar center in U.S.O.E., but to remove it from the auspices of U.S.O.E. and give it an independent status. There are several features of that bill which appeal to me. It would create a

National Board for Educational Statistics, in recognition of the need for top-level policy guidance and support. The purposes of the new N.C.E.S. would be quite similar to those which the current Center has in its charge, but the annual report to the Congress on current and projected activities, cost estimates, and reports on the condition of education provide a definite obligation to perform well its mission. S. 1539 directs the National Institute of Education and the U.S. Office of Education to make its statistical records available for the work of the National Center.

I do not believe, however, that the allocation of approximately $8,000,000 would be sufficient to carry out the new approach. From information I have been able to obtain from Commissioner Ottina's May 7 testimony at your Subcommittee's hearing, it is somewhat less than the current N.C.E.S. appropriation. In addition, I am not convinced that the requirement to review educational activities in foreign countries is as important an objective as are the other three purposes described in Sec. 414(b).

In summary, if I had to place three proposals in priority order, I would urge an independent status for the National Center for Educational Statistics, then an extensive evaluation of the Federal educational statistical capability conducted by the Office of Management and Budget, and lastly a similar analysis performed by the Department of Health, Education, and Welfare. I welcome this opportunity to have shared with you some of my thoughts and look forward to the results of your Committee's deliberations in this regard. If I can be of personal assistance to you or your staff, do not hesitate to call upon me.

Sincerely yours,

ROBERT R. WRIGHT, *Director.*

THE ASSOCIATION OF AMERICAN UNIVERSITIES,
Washington, D.C., June 11, 1974.

Hon. CARL D. PERKINS,
Chairman, General Subcommittee on Education,
Washington, D.C.

DEAR MR. PERKINS: Thank you for the opportunity extended in your letter of May 7 to comment on H.R. 13991. I have consulted with the American Council on Education on this matter and concur with their observations and recommendations.

Sincerely yours,

CHARLES V. KIDD,
Executive Secretary.

NATIONAL SCHOOL SUPPLY & EQUIPMENT ASSOCIATION,
Arlington, Va., May 28, 1974.

Hon. CARL D. PERKINS,
House of Representatives,
Washington, D.C.

DEAR MR. CHAIRMAN: Your May 7, letter to Edward A. McCabe, Hamel, Park, McCabe & Sauders, our Washington Counsel, has been forwarded to us for reply.

We are pleased to offer our comments on H.R. 13991, a bill requiring the Department of Health, Education and Welfare to conduct a study on the best means to improve the collection and dissemination of educational statistics.

The National School Supply & Equipment Association is made up of some 475 manufacturers and distributors of school supplies, equipment and instructional materials.

Our industry is starving for reliable and current educational statistics. H.R. 13991 certainly would receive our support. Such data would enable us to serve better the needs of the schools.

Presently, most of the educational data available to us originates from the U.S. Office of Education. While helpful, these statistics are normally not up-to-date nor is the data really accurate.

In our opinion, the mechanics presently exist within the Office of Education to accomplish the very worthwhile goal of meaningful educational statistics.

We believe that the creation of a new, and no doubt expensive, Federal Agency for Educational Statistics as proposed in S. 1539 would only weaken the U.S. Office of Education. Compilation and dissemination of the data should and could, in our opinion, be a specific duty of the Office of Education.

We can only conclude that all our school age youngsters, preschool, elementary, secondary, post-secondary and higher education, would benefit greatly from a plan which would lay the foundation for solid educational statistics.

Yours very truly,

JOHN L. SPALDING,
General Manager.

NATIONAL STUDENT LOBBY,
Washington, D.C., June 17, 1974.

Hon. CARL D. PERKINS,
Chairperson, Committee on Education and Labor,
House of Representatives,
Washington, D.C.

DEAR MR. CHAIRPERSON: In response to your letter concerning H.R. 13991 (on educational statistics), the National Student Lobby would like to make the following comments and recommendations on the development by the Federal government of a system of collection, analysis, and dissemination of educational statistics and information in a manner more responsive to the needs of the many kinds of persons—including students and potential students, groups and agencies directly concerned with education.

We feel H.R. 13991 would be a step in the right direction, although an interim step, and one in which no substantial change from the present would be expected to arise from recommendations of the Secretary of the Department of Health, Education and Welfare. Instead, we feel that the provisions in the Senate Amendment to H.R. 69 (Title V, Part A, Sec. 501) creating a semi-independent National Center for Education Statistics would be a much better step. Such a center (in which 6 of the 17 members of the Center's Board would be appointed by the President from the public, and in which the remaining 11 members of the Board would be specified Federal office holders with direct education responsibilities involving statistics, with the Assistant Secretary of the Department of Health, Education and Welfare for Education would be the presiding officer) would both (1) insure a continuing responsiveness in data collection, analysis, and dissemination to the needs of students, educational groups, the Congress, and Federal and state agencies which administer education programs, and (2) provide a highly coordinated federal mechanism for interrelating educational statistics work and needs of many agencies which also have educational programs to administer.

In the view of students, the need for a "responsive" education statistics center at the Federal level is clear. This is because data can only be collected, analysed and disseminated based on the "questions asked," which in turn are framed by the needs, purposes, and assumptions of the persons or agencies with a position to ask the questions. We feel it is extremely important that the needs, purposes and assumptions of a wide spectrum of persons—including students and potential students, groups, Congressional committees, Federal, state and other agencies with a direct concern about education have at the Federal level an "official forum" in which to be recognized as full participants in a continuing dialogue about the questions to be asked, and about the usefulness of the data for many purposes. It is important to us that this Federal "official forum," or center, not simply be set up to respond to the needs of persons and bodies thru the eyes of Federal agencies which administer education programs, as is the case at present.

It is clear that planning and evaluation decisions in education in the future will involve changes in concepts on exactly what we collect data about, and that the change in concepts will also need to involve a continuing process in which an ever-widening community of persons and bodies directly affected by education participates. Much change can already be seen in the new emphasis on understanding the needs of and impacts on "clients" of educational programs (students of many backgrounds). An example of the change in process of determining "what do we need to know?" in post-secondary education can be seen in the Report of the National Commission on the Financing of Post-secondary Education, in which new questions began to be asked in terms of interrelating information from many sources. In that Report, the importance of involving individuals and groups representing a wide range of students and potential students of post-secondary education was recognized as integral to the designing and evaluating of the statistical system itself. (See "Student Response to Report of National Commission on the Financing of Post-secondary Education," published November, 1973)

An additional problem with the current system of education statistics is the lack of availability of data "in time," "in proper form," and to persons outside the Federal agencies, including students and other private individuals. Data which is not available on time, in a form useful for one's purposes, or to persons outside a narrow range of planners decreases the value of the data substantially. For many persons outside the Federal agencies, the data becomes valueless, if not of negative value under the circumstances.

In the past three years the National Student Lobby has come to understand more fully the importance of "participation in the process" of collection, analysis and dissemination of information in the development of public policy and planning. This is specially so for students who have not previously been involved in this process in the past except as "individuals to be studied" in educational surveys.

We, therefore, strongly urge the Education and Labor Committee to support now and maintain a continuing concern for a student-responsive (as well as Congressional-responsive, state-responsive, and Federal agency-responsive, and private groups-responsive) National Center for Education Statistics.

We appreciate your continuing concern in this area, and look forward to working with you and the Committee on the needs of students for access to data and information services.

Sincerely,

RYAN LEARY,
Legislative Director.

Lattsburg, Va.

Representative CARL PERKINS,
Chairman, General Subcommittee on Education,
U.S. House of Representatives,
Rayburn House Office Building,
Washington, D.C.

DEAR REPRESENTATIVE PERKINS: Enclosed is my response to your letter of May 14, 1974. The report is a detailed explanation of the internal workings of the data collection efforts of the U.S. Office of Education. I would like to add the following general comments:

1. The ability and attitudes of top management in NCES and OPBE are the major problem with USOE data collection. Internal politics play a major role in the decisions made by NCES staff who systematically accept more work than they can possibly perform or direct for fear that another USOE unit will be given the responsibility if they refuse. Because of the deficiencies at the top, NCES activities are poorly managed at all levels and are usually behind schedule.

OPBE management has verbally stated and constantly evidences an attitude of total superiority and complete knowledge of all aspects of data collection, program planning and evaluation, etc. OPBE arbitrates all conflicts of view between itself and other USOE units (except NCES) and carefully screens these conflicts from the Commissioner in work being done at his request. This OPBE attitude consistently causes inadequate discussion of policy alternatives and, because of their theoretical rather than practical orientation, much more expensive and less useful data collections.

2. When USOE receives a data request from the public or Congress, NCES, OPBE, or bureau staff will find an answer. Unfortunately, these answers are rarely questioned by the recipients and are frequently only estimated or extrapolated from related data. These responses are rarely accompanied by any explanation or disclaimer of data quality.

3. Administration policies have little effect on data collection and only occasional effect on data reporting.

My report is based on an intimate knowledge of USOE data collection activities from June 1968 to December, 1973, therefore, some of my comments may not exactly reflect current activities. I have not included any comment of State and local data requirements or data systems since I have no knowledge at this level. Statements concerning bureau level problems are based on work as the major coordinator for data collection in BESE and might be inappropriate from the position of other USOE bureaus.

I am honored to provide this report and will be pleased to answer any questions your staff might have.

Sincerely,

NANCY B. ROYALL.

CURRENT ORGANIZATION OF USOE DATA COLLECTION

There are three major "units" in USOE having data collection responsibilities and these are the National Center for Educational Statistics, the Office of Planning, Budgeting, and Evaluation, and the individual program bureaus. The present functions and responsibilities of these units and of other USOE support units are outlined below:

National Center for Educational Statistics (NCES)

NCES is responsible for all data collection in USOE and is to provide all operating bureaus with statistical services as required and justified. Primarily, NCES collects general statistics on the status of all aspects of education—a sort of census of educational variables. These statistics are used to answer inquiries from the public and to provide trend data for long-range educational planning. NCES also attempts to provide statistical services to individual program managers upon their request; these services include sampling and technical reviews, data collection for special purposes, simple data analyses, etc.

Office of Program Planning, Budgeting, and Evaluation (OPBE)

OPBE is responsible for preparing USOE's plans, budgets, and evaluation reports and as a consequence, has retained the right to gather statistical and evaluative information for these purposes. OPBE does not attempt to provide services or data to meet the needs of the program bureaus and program managers for planning but views its role as that of providing planning and evaluative data for policy making at the USOE Commissioner's level and up.

Program bureaus

The program bureaus are responsible for determining the administrative data necessary for the adequate planning and management of their programs and for assuring that these data are collected. General statistical data and special study data may be obtained at the bureau's request by NCES; the only source of evaluative data is OPBE-conducted evaluative surveys. The bureaus do have the responsibility for collecting any data that relate directly to program management such as application data (in conformance with the consolidated application form A-102), financial data, State reports, etc.

OE Clearance Office

Each data collection effort of USOE must be approved by the USOE clearance officer before it may be implemented. This clearance requires that the data analysis plan outlining the intended uses of the data, the data collection plan, and the technical aspects of the collection design be approved by the clearance office.

Data Acquisition Task Force (DATF)

The DATF was originally instituted to control the proliferation of duplicative data requests made by USOE. The role of this task force has not been clearly established but it has served the purpose of requiring each program manager to plan his data collection activities in advance by requiring detailed description of the surveys under development. These descriptions are compiled and sent to the State Departments of Education for comment.

Common Core of Data for the Seventies (CCD-70) Task Force

The CCD-70 Task Force under the direction of NCES has been instituted to design a comprehensive plan for data collection and usage which would be responsive to the needs of not only the Federal Government program managers but also, over the long run, to those of State and Local Education Agencies. The CCD-70 Task Force has developed a "common core of data," i.e. the basic educational data needed to address all major educational and legislative questions at the federal level. Work is underway on the refinement of the core and the feasibility of collecting the elements of the core from State Departments of Education. The CCD-70 Task Force includes representatives of all units in USOE having data collection or program management responsibilities.

RELATIONSHIP OF USOE DATA ACTIVITIES TO THOSE OF OTHER FEDERAL AGENCIES

Department of Health, Education, and Welfare (DHEW)

There is little interaction between USOE data collection efforts and those of other agencies in DHEW. Similarly, there is no organized system to insure that appropriate USOE officials are apprised of DHEW-initiated educational data collection activities. The only control exerted by DHEW over USOE data collection is in the sign-off on funding of large data collection contracts and in the requirement that all consolidated application forms (A-102) be cleared through DHEW.

National Institute of Education (NIE)

NIE has no data collection staff or capability and has not developed a policy for such activities or for the coordination of requests for data from other data collection agencies. Currently, NCES is providing statistics to NIE upon NIE staff request.

Office of Management and Budget (OMB)

OMB reviews all USOE data collection instruments and must approve the technical design, data items and analyses of any planned data collection before it may be implemented.

State and Local Education Agencies (SEA/LEA)

USOE has made a concerted effort to coordinate its data collection activities with the SEA/LEAs. Prior to the CCD-70 activities, SEA-USOE coordination has consisted mainly of SEA comment and review of USOE planned data collections. With the advent of CCD-70, it is expected that the SEAs will take an active interested role and that this effort will prove much more useful to the SEAs than past SEA/Federal activities have.

Census Bureau

USOE has not actively solicited the assistance of the Census Bureau in collecting school district data. USOE does use the Census tracts when possible, although use of these tracts has been limited. Future USOE plans include the collection of financial data through the Census of Governments and design of this activity is underway.

SUCCESSES AND PROGRESS OF USOE DATA COLLECTION SYSTEM

The USOE data collection system is plagued by many problems—some of which are expected considering the fact that USOE is a bureaucracy and is subject to political decision-making. Despite these problems, USOE has made substantial progress in organizing its data collection activities. The major changes in USOE data collection over the past six years are described below:

Centralization of USOE Data Collection

Six years ago, USOE data collection was completely unorganized with each program bureau having complete responsibility over its own data collection activities. In those bureaus having multiple programs such as the Bureau of Elementary and Secondary Education (BESE), each separate program manager had a separate data collection system to the extent that even bureau-level management was ignorant of the various data collection activities of their own program managers. Furthermore, program managers had little regard for clearance procedures and often skipped the process. Slowly USOE management concluded that this piecemeal approach to data collection did not provide the data required for efficient USOE-wide planning and management and the Commissioner consolidated all statistical and evaluative data collection in NCES and OPBE.

USOE Recognition of Duplicated Data Requests and of the Need to Discuss Data Collection with SEAs

Six years ago, the USOE initiated surveys and related data requests were of such magnitude that the SEAs probably needed two or three full-time professionals just to meet federal information requests. SEAs might have tolerated this burden if the data requested had been used or reported, or if the same data had not been requested repeatedly.

Bureau-level management and program personnel, probably because of complaints from SEAs, began to recognize the need for internal coordination of USOE data collection and the need for discussion of USOE data collection plans with SEA staffs to enable them to plan ahead for the information they must supply. Since these first limited coordination efforts by the program bureaus, elimination of duplicate data requests and continued SEA/USOE dialogue have become major USOE "policies."

Common Core of Data for the Seventies (CCD-70)

The most promising development in USOE for both Federal and SEA data users is CCD-70. CCD-70 will provide an integrated set of data elements useful at Federal and ultimately SEA levels, and the technology and plans for effective use of the data collected. Work is proceeding very carefully and the ultimate design shows every indication of being a well-integrated and very useful system. Because of the great benefits that CCD-70 may ultimately have for them, the SEAs are evidencing great interest and active participation in the project.

PROBLEMS IN USOE DATA COLLECTION SYSTEM

USOE is finally moving in the correct direction to insure an adequate data collection system. Progress made over the last six months is encouraging however, the problems described below are still evident:

Lack of Definition of Federal Data Collection Role

With the exception of the legislation establishing USOE and NCES, there is no role statement defining USOE's data collection functions and responsibilities. In the absence of a USOE policy, bureaus and staffs in USOE carved out their own role with little direction or coordination, and USOE management adopted these various bureau roles as their own whenever an outside challenge resulted.

USOE's lack of a data collection policy is compounded by the fact that HEW management has also failed to establish a policy for HEW data collection activities. In addition, the newly-formed NIE is facing a similar lack of role definition and, as with USOE, the various units in NIE are establishing their own separate procedures.

Because of this lack of role definition, major data policy questions which should have been addressed by HEW-USOE management before any data collection activities began, have not been considered. Some of these questions include:

1. For what purposes should USOE collect data? USOE currently performs as an educational Census-taker, evaluator, program manager, educational researcher, and experimenter. What rules are needed to define or restrict the scope of these activities?
2. What limitations should be placed on the data USOE may collect? Should USOE data collection include data on individual (pupils, teachers, etc.) such as test scores, family income, race, etc. or are such information requests an invasion of privacy?
3. In most data collection efforts, USOE managers imply or state to SEAs and LEAs that the data requested are required by Congressional mandate. Should limitations be placed on the use of this explanation?
4. Should limitations be placed on USOE data collection activities such as on the number of distinct data requests that can be initiated by annually by USOE or on the size of any one collection document, etc.?

Lack of an Internal Data Collection Policy

Internally, USOE is working under a statistical "policy" which at various times has been approved and revoked by the Commissioner and whose current status is never apparent. This statistical "policy" does not provide any direction in regard to the questions posed above, but does provide some clarification of the responsibilities of NCES, OPBE, and the bureaus for data collection without actually defining the scope of these activities. For instance, according to the internal statistical policy paper, OPBE is responsible for collecting evaluation data; but USOE and HEW management have no policy designating evaluation as a USOE responsibility or defining the elements that may or may not be included in evaluation data collection documents. Clearly, evaluation is a USOE responsibility even though there is no written policy stating such; but is educational research a USOE responsibility? If research is not a USOE responsibility where is the line drawn separating evaluation and research?

Poor Conceptualization of Data Collection and Data Usage

USOE's lack of understanding of data collection concepts and data usage is closely allied to the problems caused by the lack of an HEW-USOE-wide data policy. There are two major problems in USOE's conceptualization and use of data—one in the conceptualization of program evaluation and the other in the application of data to support the functions of all management levels.

Conceptualization of Evaluation Data Collection

USOE has a particular problem in defining and understanding evaluation data collection. Many of the evaluation studies underway attempt to determine not only the degree of a program's success but also how pupil achievement (the main measure of success) is influenced by such variables as changes in cost, inservice training, materials, etc.—a type of cause-effect analysis. Theoretically, program evaluations should attempt to determine the causes and effects of diverse educational variables; but practically, on a national level, it is almost impossible to provide the controlled educational environment and the quantity of detailed data necessary for such analyses. If federal program evaluations cannot provide nationally representative data, their utility is questionable. Because of this difficulty in providing adequate data and controls, there is a decided split among USOE staff concerning the advisability of assigning cause and effect relationships in educational situations on a nationally representative basis; yet USOE has funded several expensive studies to do this without ever discussing these problems.

Data Support for USOE Management

Data are required by three different management levels in USOE—the policy level, the general program management level, and the project monitoring level. The responsibilities of these levels and their data needs are defined below:

Policy level

Policy level management is responsible for determining the general direction and long-range educational goals of USOE. This work is done mainly by OPBE for the Commissioner's approval. Policy makers require general evaluative data to determine the extent to which current USOE programs are meeting federal educational goals and to determine the advisability of revising existing programs or suggesting new programs if federal education goals are not being met. Policy makers are equally dependent upon the general Census-type data and trend analyses to determine new educational goals and to support adequate long-range planning.

Program management level

This level corresponds roughly to bureau level management and it is responsible for the long-range planning and the specific short range objectives and activities of each program under its control. The program managers of this level require general statistics for federal program participants and the national population to insure that the programs under their control are reaching, and are adequate to reach, the populations intended by legislation and to allow them to suggest alternate methods for delivering services in compliance with the legislative intent of their programs. In addition, these managers need detailed evaluative data to determine not only if their programs are successful, but also what deficiencies exist so that future operational plans may address these specific problems.

Project monitoring level

Project monitors are the front line personnel responsible for working directly with the federally-funded programs in the field. Project monitors need very specific data at very specific levels so that they may determine if local projects are straying from the intent of the law and in what areas a lack of expertise on the local level might be corrected by federal or state assistance. Descriptive statistics, financial data, and evaluation data on the local level are of great importance to these managers in their work with the individual projects and states.

These three management levels should be interdependent with the project monitoring and middle management levels assisting each other in determining specific program and administrative changes and both levels assisting the policy level in developing general educational policy as it relates to their program areas. All of these activities should be based on a complete data base.

In USOE, each management level is itself a source of data concerning program operations and management. Unfortunately, the policy level frequently ignores the experience and information available in the lower monitoring levels. This disregard has reached the point that the program planning for specific programs such as ESEA VII is done at the point that the program planning for specific programs such as ESEA VII is done at the policy level and that there is little communication regarding this planning with the other two levels. The dangers of this type of management were particularly apparent in the development of the educational revenue sharing concept when high policy levels requested, but paid only cursory attention to, the advice of ESEA I program monitors. The resulting Better Schools Act contained countless flaws in conceptualization that this type of contact could have prevented.

There is a tremendous lack of comprehension among all USOE staff levels that there are different reasons for collecting different types of data and that the data one level needs do not necessarily meet the needs of the other levels. Data collection responsibilities are housed mainly in the higher management or policy levels and this level has shown very limited vision as to the data needs of the other levels. Most data now collected by USOE address the policy needs. The data collection units in USOE, particularly OPBE, have little regard for the data needs and abilities of the middle management and project monitoring levels. If any one of the three management levels is forced to function without the data required, the efficiency of all levels is jeopardized.

Uncoordinated and Inefficient Data Collection Design and Implementation

Even if USOE leadership conceptualizes USOE's data collection role adequately and established full communication between all management levels, there would still be major difficulties with USOE data collection. Until recently, USOE units responsible for data collection—NCES, OPBE, and the program bureaus—have disregarded or been unfamiliar with the procedures for adequately designing and conducting a data collection operation. The major problems in data collection design and implementation are defined and explained below:

No analysis or planning prior to data collection

Until two years ago, almost every data collection effort of USOE was insufficiently planned prior to implementation of the data collection documents. Few data designs included prior identification of the major questions to be addressed, prior consideration of the analyses and general uses of the data requested, and prior consideration of the relevance of the data collection effort to current federal legislation or to legislative planning. Some gains are apparent in the designs of NCES and some of the program bureaus, but the problems still exist in the data requests of some OPBE studies and in almost every NIE data request.

Coordination of USOE data collection efforts

USOE management has recognized the need to coordinate data collection efforts since 1969 when BESE's consolidated statistical reports caused not only praise but also consternation in the field. Giant strides have been made by USOE in the coordination of its data requests, but the coordinated survey has produced many equally severe problems which must be addressed particularly before the advent of CCD–70. These are:

1. Consolidated surveys are enormously complex and often require that more than one state or local person respond to various sections of the same survey. Usually these surveys are quite long and because of this length are often poorly received in the field.

2. The logistics for consolidated surveys are complex and require outstanding planning and contracting—a requirement that has not been met by

most of the consolidated surveys. Furthermore, many State Departments are attempting to provide local information at the State office resulting in even more complexity and delay.

3. The time required for adequate performance of the editing, tape production, data analysis and reporting is greater than for smaller unconsolidated surveys.

4. By the time all the data from a consolidated survey has been analyzed and reported, the data are usually two years old.

Poor survey management

Although OPBE does not have a service-orientation and has several poorly designed evaluation studies, OPBE staff manage the evaluation studies quite well. On the other hand, NCES makes a serious attempt to meet the needs of the program managers and public and has several well-designed studies, but manages its survey efforts very badly, usually at the expense of data quality. Part of NCES's problem is in the limited ability of some senior staff and in the inadequate numbers of staff to meet the rapidly multiplying USOE and NIE data requests. Compounding this problem is NCES's management's inability to determine priorities and to plan only those studies for which there is an urgent and substantiated need and for which adequate staff are available. NCES management consistently overextends its staff and, as a conseqence, the staff performs poorly.

NCES, while service oriented, has not established any procedures to regulate data requests and data use. Procedures are urgently needed to:

> Formalize data requests including understanding of costs and staff time required from the requesting USOE unit, responsibilities of NCES and of the requesting staff, etc.
>
> Require complete justification of each data request from both USOE and NIE units.
>
> Assure timely access to the data collected, if necessary by releasing data to the program managers in an unedited or unanalyzed form.
>
> Identify the analyses to be provided by NCES and those that must be obtained by the requesting unit.
>
> Identify the reporting responsibilities.

In the absence of these standards, each different NCES division conducts business as and when it sees fit. Furthermore, because there are no standards, NCES management through political necessity, requires less work and justification of data requests from units such as NIE and some of the politically strong bureaus as it does from bureaus and units that it knows can, will, or must meet its demands.

These management problems have placed program managers in the untenable position of dealing with NCES staff who want to provide data and cannot; and with OPBE staff who can provide data and will not. Most program managers have access only to those administrative statistics that they are allowed to collect to manage their programs. However, the depth and detail of the administrative statistical requests are limited by USOE and OMB clearance units. In addition to the problems of obtaining data, every data request from inside and outside of USOE concerning a specific federal program, is directed to the appropriate program manager instead of to NCES or OPBE. If the program manager does not have the data requested, it is his capabilities that are questioned—not those of NCES and OPBE.

Limited Use and Reporting of Data

There are two units with major responsibility for reporting data—NCES and OPBE—and both of these units release their reports through the Office of Public Affairs which edits them. NCES reports statistical data in a good series of reports and general newsletters. These statistical reports have wide dissemination and are useful as a Census-of-education type of report. NCES's statistics reports are well received by the public and cause little problem internally because until two years ago, NCES studiously avoided any type of reporting on federally funded programs. When NCES did publish a report on a federal program, the staff usually cleared the report with the program bureau.

OPBE has responsibility for evaluation reporting particularly for the annual evaluation report to Congress and provides a series of short reports called

PIMs—Policy Implication Memoranda. OPBE has used its responsibility to provide the annual evaluation report as justification for the conduct of several complex evaluation studies—many of which are still underway and have not resulted in reports. OPBE has been very successful in meeting the evaluation reporting deadline and has shown remarkable efficiency to produce some good reports when other units in USOE have failed. OPBE does not produce reports for public consumption and the distribution of OPBE reports is limited.

The real problems with OPBE reporting are the staff's lack of understanding of specific federal programs and their choice of data to report. Slowly OPBE staff are becoming more familiar with the programs being evaluated and promising progress is evident in their work with ESAA and the ESEA Title I Migrant program. Much of this progress can be attributed to the individual staff members and their willingness to involve program officers in their work. In addition, each program bureau reviews the evaluation report and provides comments to OPBE. Unfortunately, OPBE does not pay as much attention to their comments as it might and the reports sometimes contain inaccuracies as a result.

Like most USOE officials, OPBE has little faith in data sources other than those under its control. The most obvious example concerned the 1972 evaluation report on ESEA Title I. OPBE contacted the bureau responsible for ESEA I (BESE) and requested data for the evaluation report. BESE, at that time, was writing a report on ESEA I based on the statistical data collected on the 1970 Elementary School Survey, a nationally representative study of LEAs, schools, teachers, and pupils. OPBE refused to use the data provided by BESE on the basis that the data provided were unrealiable and invalid—a statement OPBE could not prove but BESE could not statistically refute. Despite this lack of proof, BESE might have accepted this rationale if OPBE had not just funded a 1.8 million dollar study of 100 ESEA Title I reading projects and 150 other reading projects, which, with the exception of an added testing component, was an exact copy of the design used for the 1970 Elementary School Survey and included several of the same questions. If the design of the 1970 survey was good enough to copy, the data should have been good enough to report.

The program bureaus collect administrative data only and as such produce no formal reports from these collections, but use the data to administer the program and meet mandated federal application requirements. The data from these administrative reports are frequently used in budget justifications and in speeches concerning the progress and scope of federally-funded education.

There are three problems with USOE data utilization that are common to all levels of data collection and reporting and these are:

1. Not all data elements collected on a given survey from which a report is published, are used in the report or its supporting documents.
2. Not all reports that are written are released as is the case with several major reports written in the past years from some of the largest USOE data collection efforts.
3. With the exception of the NCES statistical series, those reports that are published by USOE are rarely circulated to the survey respondents, to the educational community, or to the public.

SOLUTION FOR DATA COLLECTION PROBLEMS

Lack of Definition of Federal Data Collection Role

1. HEW should initiate action to insure that HEW, USOE, and NIE establish a concise statement of their roles and interrelationships in the collection of educational statistics. In performing this task HEW should:

Delineate the data roles and interrelationships of NIE and of USOE.

Provide direction on any limitations especially legal restrictions, on USOE data collection activities.

Clearly define the data collection relationship of HEW-USOE-NIE to other federal agencies.

Oversee the dissemination of this role statement to all data collection personnel in HEW, USOE, and NIE.

2. USOE should clearly define the role of NCES, OPBE, and the program bureaus in data collection. In performing this task, USOE should:

Define the responsibilities of NCES and OPBE in providing statistical evaluation data to the program bureaus and to the public.

Define the role of the program bureaus in requesting data from NCES and OPBE.

Define the role and restrictions on the bureaus in the collection of administrative data.

Define the role of all units in providing statistical, evaluative, and administrative data to the public and other USOE units.

Define the legal restrictions, if any, on USOE data collections.

Provide assistance in the clarification of data collection concepts and usage as it relates to the USOE data collection role.

Poor Conceptualization of Data Collection and Data Usage

1. Within the constraints of the USOE data collection role statement, USOE management, OPBE, and the program management bureaus should define evaluation and should clearly discuss the theory and practice of establishing educational cause-effect relationships and its effects on program recommendations. Perhaps the concept of project level evaluation and certification of project success (IVD) are a viable replacement for cause-effect analyses.

2. The role of USOE and its units in data collection should be reviewed by all data collection personnel. The USOE staffs should also realize that there are three levels of needs for data and that all of these levels must be met before a good data system is established. To some extent the CCD–70 effort is having a decided educational effect in this area.

3. Communication between the three levels of management must be improved. The policy level's continuous practice of ignoring the recommendations of lower levels or at least not expaining their decisions when a conflicting view exists, is ruining the morale of front line program managers. Program managers know the program better than any other management level in USOE and their advice should be solicited.

Uncoordinated and inefficient Data Collection Design and Implementation

1. Data collection designs and planning are improving and the USOE-wide CCD–70 effort will attest to this. USOE management should foster effective data collection by requiring that all data studies include a detailed statement of the questions to be addressed, the analyses to be performed, and other elements that promote good data collection; before clearance is permitted. Clearance officers should be much stricter and should be supported by USOE management.

2. A review of USOE's policy of consolidated surveys should be required because consolidated data requests may be more of a problem than a help to SEAs.

3. The management structure of NCES should be assisted in the following ways:

Require NCES to establish user procedures and enforce them.

Provide the staff needed to support the work that NCES is requested to do.

Assist NCES management in restricting its activities to a manageable scale.

Require NCES to become more productive and to report more closely on its activities.

Limited Use and Reporting of Data

1. Require NCES to publish some of those reports from past years.

2. Disseminate appropriate OPBE studies widely.

3. Provide an appeals route for program managers which will prevent OPBE from resolving all conflicts between OPBE and program manager's views without explanation particularly those regarding data use and interpretation. Frequently, the Commissioner receives reports from OPBE with no realization that a divergent view exists.

4. Require tighter review of the uses of data collections and statistical and administrative data to insure that it is useful.

COMMENTS ON H.R. 13991

H.R. 13991 requiring a look at the USOE data capabilities is long overdue since USOE has never functioned well in the statistics area. I fear that the response required by your bill will be limited if the source of information for the report is NCES, OPBE, and the higher levels of USOE-HEW management, since these units are part of the problem. The real problems exist in providing information to the public and to program managers and monitors who must make decisions daily regarding the operation of their federal programs without the benefit of the data that NCES-OPBE should provide.

COMMENTS ON S. 1539

I am not very familiar with S. 1539, but the following points might be made:

1. The placement of the statistical responsibilities for education is irrelevant as long as problems with the quality of management, the numbers of staff, and the lack of a USOE role definition exist.

2. There is one danger inherent in a separate Federal agency for educational statistics and that is the influx of high level politics. There are enough problems in obtaining and releasing education data that conflict with administration policy without adding a politically appointed director and governing board to the morass of decisionmakers. The best placement for educational statistics is in the Office of the Assistant Secretary for Education, assuming that this office will become powerful enough to enforce the necessary decisions—a power which it now lacks. The unit should have a Civil-Service director and should collect or coordinate the collection of all data required by NIE and USOE.

CHILDREN'S DEFENSE FUND,
OF THE WASHINGTON RESEARCH PROJECT, INC.,
Cambridge, Mass., June 17, 1974.

Hon. CARL PERKINS,
U.S. House of Representatives,
Washington, D.C.

DEAR CHAIRMAN PERKINS: Thank you for requesting our comments on federal data collection efforts in education. As you know, the Children's Defense Fund is currently trying to determine how many children ages 7 to 15 are not in school, who they are, why they are excluded, and who is responsible for their education. In connection with our study, we have tried to determine what data on nonenrollment is available on the state and federal level. We have asked questions only about the elementary and secondary school grades, and our scope is limited further because our primary interest has been children rather than expenditures or teachers. We have not examined, therefore, deficiences in information on staffing or educational expenditures which we know exist. We have tried to use the basic educational data compiled by the Bureau of the Census and the National Center for Educational Statistics (NCES) and, because we are interested in services provided to children with special needs and discipline policies and practices, especially as they affect minority children, we have used the information available from the Office for Civil Rights (OCR) in HEW and the divisions within the Office of Education responsible for administering specific federal programs.

We have been seeking statistical information in an attempt to answer four basic questions:

First, how many school-age children in this country are not enrolled in school?

Second, who are these children? Are they physically or mentally handicapped? Are they non-English-speaking children or children of limited English-speaking ability?

Third, what types of special programs are being offered children with special needs so they may effectively participate in the educational process?

Fourth, how many children are not enrolled in school because they were effectively excluded from appropriate educational programs? For example, how many students have been suspended or expelled, have not been allowed to attend school because they were pregnant, or have withdrawn as a result of more subtle pressures from the school system.

We are terribly concerned by the limited amount of hard data we have been able to obtain. We strongly believe that the federal government is the only agency capable of doing this and should bear the responsibility for adequately documenting who is or is not benefiting from our educational system. Although providing educational services has been the province of the states, there is a firm national interest in increasing educational offerings to our citizenry, and historically it has been one of the undisputed functions of the U.S. Office of Education to gather and make available information about education. The federal government has the expertise and resources essential to developing a useful data collection system. It can design model collection instruments which ask consistent questions across states so data can be compiled for national use, and it can be the impetus for the states to see the importance of maintaining specific data for planning and evaluation purposes.

The difficulties obtaining reliable national data which we encountered in our research on children out of school is echoed in other research efforts in education. Our own previous studies of Title I and desegregation activities faced similar obstacles. Other researchers looking at a wide array of educational issues from a variety of political viewpoints have one thing in common: the data from state and federal sources are frustratingly insufficient. Most studies must collect their own information. This is costly, discourages many projects from continuing, limits the scope of the research, and is an inefficient duplication of effort. In some cases, the questions asked are those for which data are available rather than those which are crucial to understanding educational effectiveness or examining particular policies.

In addition to facilitating research, good data is crucial for state and federal decisionmaking and accountability. The federal government must set the standards in this area. We will describe below the preliminary results of our attempts to answer four basic questions about nonattendance from existing data sources. But although the examples we will give are specific to our needs, they reflect overall problems of national educational statistics which need major, rather than piecemeal, reform effort.

I. CHILDREN NOT ENROLLED IN SCHOOL

The Bureau of the Census collects the only useful data available at the federal level on the number of children not enrolled in school. The 1970 Census of Population, conducted as of April 1, 1970, asked persons in a 15 percent sample whether they had attended "regular" school or college at any time between February 1, 1970, and the time of enumeration. Even though the census question was phrased in terms of school *attendance*, it is interpreted by the Census Bureau to reflect school *enrollment*. For example, students who had been enrolled in a regular school since February 1, 1970, but who had not actually attended because of illness or other reasons, were counted as enrolled by the census definition.

The Bureau of the Census also collects data on school enrollment in its annual Current Population Survey (CPS). The data are published annually in *Current Population Reports*, Series P–20. Unfortunately, the data collected in the Current Population Survey cannot be directly related to that in the 1970 Census because of such differences as the size of the sample (a survey of only 40,000 households) and the definition of enrollment (the CPS asks for those currently enrolled in October).

In its Annual Elementary and Secondary School Civil Rights Survey, OCR has asked local school district officials since 1969 for their best estimate of the total number of school-age children who reside within the boundaries of their school district but who are not in school. Unfortunately, because OCR has never precisely defined "not in school" for local school districts, there have been gross variations from district to district in the information reported. We know from interviews in connection with our study on children out of school that estimates of non-enrollment have been derived in a number of different, often arbitrary, ways by various districts. This variation reduces greatly the usefulness of such data, and it has seldom been used, even by OCR itself.

There are no other federal data available on non-enrollment, probably because such data are seldom collected by local school districts or state departments of education. Approximately 30 percent of the states do not have any overall education data collection mechanisms. Although approximately 70 percent of the states require a regular school census, there is great variation among states in how frequently the census is conducted (e.g., annually, every two years, four years, etc.), in the age span covered, in the methodology employed and in the questions asked. Therefore, state censuses often do not provide reliable, comparable data and are not helpful presently in determining the number of students out of school.

We believe that such data must be collected more frequently than every ten years in all the states. If education is compulsory for *all* children, then local school districts have a reciprocal obligation to accurately count the number of children who are in fact not being provided an education. Since many states are required by law to conduct a school census, the federal government could begin by collecting information from these sources. To make such data comparable, however, a uniform system for conducting the censuses and reporting the results must be established. The Bureau of the Census, in cooperation with the Office of Education, is the appropriate agency to develop model census materials to be used by state departments of education and local education agencies. These state censuses should be conducted at intervals within the ten-year period covered by the National Census of Population, and should reflect in more detail than the decennial census the types of children who are not enrolled in school.

If a household survey is to be incorporated into the censuses, special financial allocations should be made. If other than a door-to-door survey is used, steps must be taken to ensure that the censuses are more than an accounting of children who were not enrolled in school in the fall of one year but had been enrolled the previous spring.

Since we could not get data on the number of children out of school, we tried to ascertain the total number of students in elementary and secondary schools in the country. If we subtracted this number from the total number of children in the proper age range, we could get a ballpark estimate of the number of children not in school. Also, by finding out the numbers of children in school with special needs, we could begin to assess whether programs for these children were adequate. Although we contacted a number of agencies, we could not arrive at a current figure for the number of students presently enrolled in school. While there are several annual surveys conducted on public school enrollments, the last full survey of nonpublic enrollment was conducted by NCES in fall, 1970, and was not released in full until November 1973. In its annual survey, OCR asked school district officials for an estimate of the number of children in their districts who are enrolled in nonpublic schools. However, because the figures reported are estimates, a national nonpublic school enrollment figure has never been compiled. Rather, the figure has been used in individual districts to assess the movement to nonpublic schools which accompanied desegregation.

The Council for American Private Education, which represents about 95 percent of the nation's private school enrollment, presently relies on the Fall 1970 NCES survey of nonpublic schools, but would like to develop a better data gathering system on private schools. The National Catholic Education Association has, since at least the 1969-70 school year, prepared an annual statistical report on enrollments in Catholic elementary and secondary schools, and the National Society for Hebrew Day Schools and the Board of Parish Education for the Lutheran Church, Missouri Synod, also maintain some central enrollment data. Efforts should be taken by the Office of Education in cooperation with existing organizations of private schools to improve the frequency with which data on nonpublic schools is obtained.

II. DESCRIPTION OF CHILDREN NOT ENROLLED IN SCHOOL

The 1970 Census includes information on the age, sex, race and national origin of the children who are not enrolled in school, but tells nothing about why these children are not enrolled. We wanted to find out if there were identifiable characteristics that correlated with nonenrollment. Our experience has revealed that a physical or mental handicap and a limited ability to speak English are among the conditions which exclude children from school. No precise data exist on the federal level on the number of children in these categories who are not enrolled in educational programs. We do not mean children who are in school but who are not receiving appropriate special educational programs thereby being effectively excluded. Rather, we mean children not enrolled in school at all.

A. *Handicapped Children*

The problem of obtaining adequate figures on the number of handicapped children out of school is compounded by the fact that reliable estimates of the total number of handicapped children in the country are not available. Although the Bureau of Education for the Handicapped has published incidence rates for various handicaps, these differ when applied to various age groups and to different sections of the country. Different definitions of handicapping conditions also affect any figures on the number of handicapped children being served by educational programs.

The only source of data presently available on the federal level on handicapped children who are not enrolled in educational programs is the Bureau of Education for the Handicapped, which estimated that as of the 1971–72 school year over 50 percent of handicapped children ages 5 to 19 were not in educational programs. It calculated the number of children being served by federal, state, and local programs, from data submitted by the states on OE Form 9016, "Description of Projected Activities for the Education of Handicapped Children." This report attempts to collect information, in summary fashion, on all funds used for the education of handicapped children in individual states. The states report, by handicap, the number of children expected to be served by special programs. At one time, the Projected Activities Report asked the states to supply figures on the numbers of handicapped children not being served by educational programs. However, because the figures submitted by most states were based on the national incidence percentages for various handicaps and not independent state estimates providing new information, the question was discontinued.

B. *Children of Limited English-Speaking Ability*

Similar problems are confronted in determining the number of children of limited English-speaking ability who are not enrolled in educational programs. The only data available at the federal level is in the Division of Bilingual Education in the Office of Compensatory Educational Programs. It prepared a base statistic from the 1970 Census data (the number of persons in age group 3–18 who come from homes where the dominant language is other than English) and from various staff sources. However, it is not possible to contrast this figure with the number of children served by educational programs because there is no centralized data available on how many children of limited English-speaking ability are in federal, state and local bilingual and English as a Second Language programs.

With the institution of legislation and litigation for educational programs for bilingual and handicapped children, state departments of education are being required to identify children of limited English-speaking ability and handicapped children. Again, if such data as are being collected in these special surveys are ever going to be useful on a national scale, some uniformity from district and state to state must be maintained. A provision for the identification of handicapped children and children of limited English-speaking ability should be included in whatever model census is developed by the Bureau of the Census in conjunction with the Office of Education.

III. PROGRAMS FOR CHILDREN WITH SPECIAL NEEDS

Because so little adequate data were available on the number of students not enrolled in educational programs, we turned our efforts toward figures which might be available on the number of students with special needs who are enrolled in school. We hoped that we could then draw conclusions on our own as to the number of students *not* being served. We quickly determined, however, that little hard data are available on the number of students with special needs being served by the various federal programs designed to assist such children.

A. *Programs for the Handicapped*

1. *ESEA Title I*

Although funds allocated under Title I of the Elementary and Secondary Education Act (ESEA) of 1965 may be used for the handicapped, only limited data are available on the number of handicapped children actually being served by Title I programs in almost 14,000 school districts. The Division of Education for the Disadvantaged in the Office of Compensatory Educational Programs has collected no statistical information on students being served by Title I programs since the 1968–69 school year. (The data gathering function in the Bureau of Elementary and Secondary Education was moved to the Consolidated Program Information Report (CPIR), which will be discussed in more detail below.) Although individual states may require local education agencies to submit information on the number of children participating in various types of Title I programs, this information is not submitted to Washington or to the federal regional Title I offices. The states must submit Annual Evaluation Reports to Washington each year, but since there is no standardized form for these reports, there is great variation in the quantity and quality of data submitted. We reviewed the most current Annual Evaluation Reports submitted by the state departments of education in the nine states and the District of Columbia included in our study. Only seven of them gave any information on services provided handicapped children, and the types of data given on these programs were not consistent. Only one of the seven, Maine, gave any indication of the various handicapping conditions affecting the children being served.

There is more useful information available on handicapped children served under P.L. 89–313, an amendment to ESEA Title I, which provides funds to state-operated and state-supported schools. This program is administered by the Bureau of Education for the Handicapped. Figures, by state, on the number of children served and the allocations under P.L. 89–313, by handicapping condition, are available.

2. *ESEA Title III*

Although more data are available on the number of handicapped children served under ESEA, Title III than under ESEA Title I, there is still no centrally compiled information available by handicapping condition. ESEA Title III provides two set-asides to be used for special educational programs for handicapped children. Federal regulations require that the states must maintain figures on the amount of funds expended for the education of handicapped children, broken down by type of handicap, for each Title III project funded. The State Educational Agency Annual Report on ESEA Title III (OE Form 4426) includes figures on the type and age of handicapped children served by Title III projects. But although the Division of Supplementary Centers and Services had figures on the total number of handicapped children in Title III projects by state, compilations by handicap were not available even for the 1971–72 school year.

3. *Education for the Handicapped Act*

In order to obtain figures on the number of handicapped children being served to the individual program officers in the Bureau of Education for the Handicapped. As mentioned earlier, it is possible to obtain figures, by handicap, on the estimated number of children to be served by federal, state and local programs, but actual figures, by handicap, on the number of children served by programs funded under Part B of the Education for the Handicapped Act were not centrally compiled. Individual school districts receiving funds through their state departments of education under Part B are required to submit to the state education agencies a project report which includes figures on the number of children served by age and handicapping condition. Although these reports are submitted on an OE form, only complimentary copies are submitted to the Bureau of Education for the Handicapped. Less than 80 percent of the projects funded send copies of the report to Washington, D.C. To our knowledge, no compilation of these figures, by state or by handicap, has been prepared.

In addition to programs funded under Part B of the Education for the Handicapped Act, we are also interested in the deaf-blind centers funded under Part C and the special programs for children with specific learning disabilities funded under Part G. It was not possible to obtain precise figures on the number of deaf-blind children or children with specific learning disabilities receiving direct educational services because types of programs vary widely. It was estimated that one-third (1,900) of deaf-blind children are receiving full-time educational services at the eleven deaf-blind centers funded under the Education for the Handicapped Act during Fiscal Year 1973. Forty-four model demonstration service centers for children with specific learning disabilities were funded under the Education for the Handicapped Act in fiscal 1973 as well. Because some of these centers are primarily facilities for research, staff training and curriculum development, program officials did not have precise figures available on how many children were served. They estimated that approximately 8,500 children had received some form of direct services through these centers.

4. *Vocational Education Amendments of 1968*

We also attempted to determine the number of handicapped children being served by programs funded under the Vocational Education Amendments of 1968. They provide that a ten percent set-aside in basic grant funds be spent in each state to assist the handicapped to succeed in vocational education programs. "Handicapped," is defined as an individual who cannot be expected to succeed in a regular vocational program, requiring special educational assistance or a modified vocational program. Because the definition of "handicapped" is more restricted than in other programs, it is difficult to compare the data on handicapped children served by vocational education programs with that on handicapped children being served by other programs. There is also difficulty in applying this data to our study of children out of school because although figures on the number of handicapped persons being served by various vocational programs are provided, there is no indication of what proportion of these are secondary, as opposed to post-secondary, students, nor any indication of the handicapping conditions of the participants in the program. Furthermore, we do not know that percentage of the handicapped students in need of special services are receiving them.

The type of data maintained by the Bureau of Adult Vocational and Technical Education at OE points out a conflict which pertains to much of the data maintained by various divisions of OE. The Bureau is interested primarily in descriptions of the types of programs being funded under the Vocational Education Amendments. Congressmen and others trying to evaluate the effectiveness of certain legislation are more interested in who is being served by the various programs. If data on programs are to be useful, both of these interests must be accommodated.

5. *NCES survey*

A survey conducted by NCES in the Spring of 1970, as part of the 1970 School Staffing Survey, attempted to show the extent to which special instruction was being provided to handicapped pupils in local public schools. However, because the data was collected from a survey of only approximately 2,000 elementary and secondary schools, no state by state breakdowns of the data are available. The survey does give data for each of nine handicapping conditions. NCES estimated that 4,752,000 handicapped pupils were enrolled in public schools in the United States in Spring 1970, and that almost 3 million of these were receiving some special services. However, this estimate exceeds the 1971–72 estimate prepared by the Bureau of Education for the Handicapped, which said that less than 3 million of the total number of children in the country (ages 0–21 years old) got special education services. However, their incidence estimates for various handicapping conditions differed from those prepared by the Bureau of Education for the Handicapped.

6. *OCR survey*

The Annual Fall Elementary and Secondary School Civil Rights Survey conducted by OCR also contains some useful information on the number of pupils being served by various special education programs. The OCR data are particularly useful because they provide the only racial and ethnic breakdown available at the federal level on children classified according to various handicaps. We share OCR's concerns about the potential for assigning students discriminatorily to special education classes. We are also concerned that children are being misclassified and wrongly placed in special programs.

Although there is a problem because the OCR data do not precisely indicate the handicapping conditions being served by various special education programs, it is the only data which give racial or ethnic breakdowns and is also available by district. OCR's Fall 1973 Survey was the first one to provide any sort of information on the various types of special education programs. The 1973 survey was based on a smaller sample than the 1972 survey, but it accounts for over 50 percent of the total enrollment in the country's public elementary and secondary schools and about 90 percent of the total minority enrollment.

B. Programs for children of limited English-speaking ability

We know that non-English-speaking children and children of limited English-speaking ability are likely to be excluded from school and from appropriate educational programs. We wanted, therefore, to obtain whatever data was available on the number of such children being served by special programs in order to ascertain the proportion of such children whose special needs were not being met. We contacted the program officers responsible for administering ESEA Title VII, ESEA Title I, ESEA Title I (Migrant), ESEA Title III, and the Emergency School Assistance Act. There is no composite data available at the federal level on the number of children being served by various bilingual or other programs whose purpose is to increase the English-speaking-ability of certain children.

1. *ESEA Title VII*

The Division of Bilingual Education, which is responsible for administering ESEA Title VII, had the best data available, which was only on the number of students being served in the bilingual projects funded under Title VII. They had data available for fiscal years 1970 through 1973, by project, on the estimated pupil participation, the dominant language served, and funding levels. However, the data provided were estimated participants rather than actual participants. They did not give the percentage of the pupils who came from environments where the dominant language is one other than English or the percentage who have limited English-speaking ability. When data are requested on the number of participating pupils who are of limited English-speaking ability, attention must be given to the manner in which this figure is determined, i.e., there must be a uniform measure by which school districts can determine what constitutes "limited" English-speaking ability.

2. *ESEA title I*

No figures were available on the number of children participating in English as a Second Language (ESL) programs or bilingual programs funded under ESEA Title I. As in trying to determine the number of pupils participating in special programs for the handicapped, the only available sources of data were the Annual Evaluation Reports submitted by the various state departments of education. Two states included in our study, Colorado and Massachusetts, have significant numbers of children whose dominant language is one other than English. However, only in the Massachusetts report was there any indication of the number of children participating in Title I ESL classes. There were no figures on participation in Title I ESL programs in Colorado. New Mexico, whose Annual Evaluation Report we had an opportunity to review also did not provide any data on children participating in Title I bilingual programs. Figures on ESL or other bilingual programs are submitted to the state departments of education by the local agencies, but never to the federal government.

3. *ESEA Title I (Migrant)*

The Title I Migrant program has never collected any figures by language or other program components on the approximately 360,000 migrant children being served by Title I programs. Officials estimate that between 80 and 85 percent of these migrant children are of limited English-speaking ability, and they suggest that most of them are getting some language training, "because it is an essential component to any overall program." The Uniform Migrant Student Record Transfer System, a computerized data system which provides education and health information on migrant children, contains no information on the English-speaking ability of the migrant children. These data and information about the types of special programs being provided these children should be added to the system.

4. *ESEA Title III*

Although there are bilingual programs funded under ESEA Title III, no data are available on how many programs there are or the number of students being served. A review of the abstracts of the over 1,400 individual projects funded under Title III last year should provide the total number of children being served by bilingual programs, but no indication would be given about the percent of children served who had a dominant language other than English.

5. *ESAA*

1973–74 was the first school year in which bilingual/bicultural programs were eligible for funding under the Emergency School Aid Act (ESAA). Four percent of the funds allocated under Title VII of the Education Amendments of

1972 were mandated for children whose dominant language is other than English. One of the criteria for ESAA assistance to bilingual programs is the number of children whose dominant language is other than English who are enrolled in a district. We were not able to obtain centrally the number of pupils served by the 39 bilingual programs funded under ESAA, although we did obtain the amount of funds received by each of the programs.

6. *OCR Survey*

OCR requests some data on bilingual instruction in its annual survey. These data, which are collected only at the district level and not school-by-school, do not include information about the sources of program funding. They do, however, provide an indication of the number of children who receive bilingual instruction—instruction in any subject matter in a language other than English. An item was added to the survey this past fall asking for the number of first grade pupils in the school district whose primary language is other than English. We understand that a question asking how many students who need bilingual instruction are not receiving it may be added to the Fall 1974 Survey Report.

In 1973 the Center for Applied Linguistics (a private organization in Arlington, Virginia) attempted to collect data on the various types of bilingual programs offered in public and private schools throughout the country. They were interested in gathering information for each program on: (1) the nature of instruction and the materials being used; (2) the dominant language of instruction; (3) the number of children served and the percentage that were non-English-speaking; and (4) the source of funding for the program. We think a similar effort should be undertaken at the federal level, perhaps in conjunction with an organization like the Center, to ascertain the total number of students of limited English-speaking ability being served by bilingual programs receiving federal, state and local funds. It is important that such an effort be coordinated with the attempt to develop census data on the total number of school-age children in the country who are of limited English-speaking ability.

7. *CPIR*

The excuses given by individual programs for their lack of data were related to the fact that, in 1969, the Bureau of Elementary and Secondary Education attempted to consolidate the program information being collected in the Office of Education. It permitted individual programs to collect financial information, but all other statistical information such as the number of children served by particular programs would be collected in the Consolidated Program Information Report (CPIR).

Initially, the CPIR was restricted to ESEA programs. Later, it was expanded to include programs funded under the National Defense Education Act (Title III), the Civil Rights Act of 1964 (Title IV), and the Vocational Education Act, as well as other federal programs. The purpose of the CPIR was to collect data from national and state samples on: 1) the number of children in defined population groups being served by various federally-aided programs; 2) the expenditures for these programs (by population group); and 3) the number of staff members funded by and participating in the programs. Supplemental data were collected on programs funded under ESEA Title I (Migrant, ESEA Title I (Institutions for Neglected and Delinquent), ESEA Title II and ESEA Title III.

Although we are sympathetic with the attempt to consolidate the types of information being requested of local school districts and state departments of education, we are concerned by the apparent failure of the initial consolidation attempt. The CPIR has been used to collect data on federal programs operating during the 1969–70, 1970–71, and 1971–72 school years, but results of these CPIR surveys have not been formally published, nor are they available for review. We question whether the CPIR data will be of any use, even when it is published, in evaluating the impact of particular federal education programs. Our concern, in addition to the obsolescence of the data, is the fact that the report refers to defined pupil populations served by the respective federal programs as mutually exclusive groups. In completing the report, officials must assign pupils to groups (e.g., children from low income areas, from non-English-speaking environments, handicapped children, migrant children, neglected and delinquent children, or dropouts) based on the most significant treatment received. Thus, we will not know, for example, how many non-English-speaking children or how many handicapped children were served by Title I if they were recorded as being "from low income areas."

NCES took responsibility for the CPIR in 1971. One major problem was that none of the individual programs included in the CPIR were able to make use of the data obtained. Since the CPIR was distributed in the fall of 1972, however, NCES has revised the form substantially and it was just recently circulated to approximately 2,500 school districts requesting data on various federally-aided programs administered during the 1972–73 school year and the 1973 summer term. In revising the CPIR, NCES staff met with representatives of each of the federal education programs to ensure that the information CPIR was requesting would be useful at the program level.

Basically, the revised CPIR asks for counts of the children who received special services in federal programs, counts of the staff members assigned to particular programs and administering special services, and information concerning federal expenditures for particular programs. CPIR also requests supplemental information concerning programs funded under ESEA Titles I, II, III and VII, NDEA Title III, the Education for the Handicapped Act and the Indian Education Act.

Although it will not be possible to assess the usefulness of the current CPIR until the data has been collected and published, it is encouraging to note that questions on the revised form are those for which we have not previously been able to find answers. If the CPIR is completed properly we should know the number of participating and non-participating pupils with limited English-speaking ability and the number who are English-dominant, as well as the number of participating and non-participating bilingual professional personnel for each ESEA Title VII program funded during the 1972–73 school year. All school districts receiving funds under ESEA Title VII, Title I (Migrant), Title III, Title VIII and Follow Through are included in the CPIR sample. School districts with other federally aided programs are sampled for inclusion in the CPIR on the basis of five enrollment strata.

One drawback of the revised CPIR is that, because a state representative sample is no longer used, the data collected for the 1972–73 school year (for other than the "certainty programs," i.e., ESEA Title VII, etc.) will be available only on a national level; no state breakdowns will be available. Information such as the number of handicapped children served by federal programs will be less descriptive because programs for the handicapped are not evenly distributed throught the country. State by state data would be more useful.

NCES has developed a state aggregated summary form which it is proposing to send every state department of education as a supplement to the CPIR, requesting information on the participants, staff and expenditures in ESEA Title I and II programs. It would then be possible to have state by state breakdowns for them. Allegedly, using similar aggregated forms for programs for the handicapped and vocational education programs was discussed, but it was decided not to use them at least for the 1972–73 school year, because these programs were in the process of redefining their data acquisition needs.

Although we still see problems with the CPIR as presently designed, we think that it could be used as a vehicle to improve the collection of data, at least for federal programs. Each state department of education has designated a CPIR coordinator to monitor the completion of the CPIRs by local districts. If the mandate for the CPIR or a similar data collection instrument was expanded, this organizational structure, with a liaison at the state level, would be useful.

IV. SCHOOL DISCIPLINE, DROPOUTS, AND OTHER PROBLEMS

Our fourth question is how many children effectively are being excluded from school because appropriate educational programs are not available. How many children are expelled or repeatedly suspended? How many pregnant girls have not been allowed to attend school? How many students drop out because of other pressures the school officials more subtly place on them?

Little universal data exist on students who have withdrawn from school for various reasons. Although ESEA Title VIII deals specifically with dropout prevention, and funds under both ESEA Titles I and III have been used for dropout prevention programs, no data exist contrally on the number of actual dropouts or potential dropouts who have been served by programs funded under these titles. Because none of the 19 dropout prevention projects currently funded under Title VIII are in school districts included in our study, we did not review the individual files maintained on each of the 19 programs. We do know, however, that some comparisons have been done of the dropouts rates in target schools in each project.

The problems obtaining data on dropout programs funded under ESEA Title I or Title III are similar to those described previously regarding programs for handicapped children and children of limited English-speaking ability. The revised CPIR should give a better idea of the number of dropouts served by federal programs and the types of services that are being provided to them.

NCES has estimated national figures on dropouts based on school retention rates of fifth grade enrollments. These estimates were derived by comparing estimated high school graduation figures for a particular year with the estimated fifth grade enrollment eight years earlier. While such figures are useful in indicating the changes in dropout rates over the years, we think it would also be useful to collect data from individual districts and states on the number of students dropping out and the reasons they give for withdrawing. A number of the states included in our study prepare reports annually on dropouts and we think that, with some guidelines from the federal government to ensure relative uniformity, these data could be collected centrally at the federal level.

We have suggested to OCR that it include a question about the number of dropouts in its annual survey this coming fall and have received an informal indication that such a question will be asked. We realize that the definition of a dropout may vary from district to district, but we think it valuable that OCR will receive information by race and ethnic group.

The OCR survey also provides the only information available at the national level, and in many instances at the state level, regarding the number of students expelled and suspended from local school districts. District-wide data on expulsions have been collected by OCR since 1971 and data on suspensions was collected for the first time this past fall. We visited 17 school districts for our study of children out of school and found that in over half the districts the only figures on suspensions centrally available were those compiled for the report to OCR. It is apparent that many school districts compile information, which often turns out to be of value to them, only at the request of the federal government. Because it is the only data source in many instances, we have strongly urged OCR to ask more questions about school discipline and suspensions, e.g., the number and length of time for which students are suspended.

Because so little hard data presently exist from the numerous education surveys conducted at the federal level, we recommend that OCR be enabled to expand its annual survey. We recognize that the survey was conceived as a civil rights compliance tool, and when we asked OCR to add questions on suspension they reminded us of this purpose and their space limitations. However, the usefulness of the OCR survey could be made much broader with minimal additional effort. We have been alarmed at the suggestion that it be curtailed or discontinued because of financial considerations. Such a move would be a major setback not only to civil rights enforcement efforts but to the collection of education data in general.

The OCR survey is the largest education survey conducted at the federal level, and one of the only ones that includes any data on race, ethnicity or data on a district-by-district and school-by-school basis. The large sample survey which has been conducted by OCR in the fall of every even-numbered year since 1968 covers over 90 percent of the Nation's public elementary and secondary school pupils. All school districts with 3,000 or more students are included in the survey and the sampling rate for those under 3,000 varies from 75 percent to 25 percent.

It is absolutely essential, in our opinion, that OCR's Elementary and Secondary School Civil Rights Survey be continued and expanded, perhaps in conjunction with other efforts at the federal level.

Our review of federal data on education, even though limited in scope, has impressed upon us the tremendous need that exists for the development of more coordinated information on the number of children who are or are not being served effectively by the present educational system in our country. The development of such coordinated information can only occur if there is guidance from the federal level as to the types of data that must be collected and the manner in which they must be obtained. Efforts must also be undertaken to ensure that whatever data are collected will be published as soon as possible. Particularly when planning for children with special needs, it is necessary to have current data on the number of these children being served by special programs so that an accurate assessment can be made of the need for additional services.

Our review of federal data is continuing. We hope, however, that our preliminary observations indicate some of the inadequacies in federal education data, and encourage you to continue to explore ways to remedy these inadequacies. We hope this is helpful to you.

Sincerely,

MARIAN WRIGHT EDELMAN.

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